

PRELIMINARY REVISED DRAFT CAAPP PERMIT
April 8, 2014

Attention:

Meyer Steel Drum, Inc.
Attn: Ornella Joyner
3201 South Millard Avenue
Chicago, Illinois 60623

State of Illinois

CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

[Title I and Title V Permit]

Source:

Meyer Steel Drum, Inc.
3201 South Millard Avenue
Chicago, IL 60623

I.D. No.: 031600APY
Permit No.: 95120079

Permitting Authority:

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
217/785-1705

CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

[Title I and Title V Permit]

Type of Application: Renewal
Purpose of Application: Renew Existing CAAPP Permit for 5 Years

ID No.: 031600APY
Permit No.: 95120079
Statement of Basis No.: 95120079-1304

Date Application Received: September 8, 2009
Date Issued: TBD

Expiration Date: TBD
Renewal Submittal Date: 9 Months Prior to TBD

Source Name: Meyer Steel Drum, Inc.
Address: 3201 South Millard Avenue
City: Chicago
County: Cook
ZIP Code: 60623

This permit is hereby granted to the above-designated source authorizing operation in accordance with this CAAPP permit, pursuant to the above referenced application. This source is subject to the conditions contained herein. For further information on the source see Section 1 and for further discussion on the effectiveness of this permit see Condition 2.3(g).

If you have any questions concerning this permit, please contact Bruce Beazly at 217/785-1705.


Raymond E. Pilapil
Acting Manager, Permit Section
Division of Air Pollution Control

REP:MTR:BDB:jws

cc: IEPA, Permit Section
IEPA, FOS, Region 1
Lotus Notes Database

Meyer Steel Drum, Inc.
I.D. No.: 031600APY
Permit No.: 95120079

Date Received: 9-8-2009
Date Issued: TBD

Section	Table of Contents	Page
1	Source Information	3
	1.1 Addresses	
	1.2 Contacts	
	1.3 Single Source	
2	General Permit Requirements	4
	2.1 Prohibitions	
	2.2 Emergency Provisions	
	2.3 General Provisions	
	2.4 Testing	
	2.5 Recordkeeping	
	2.6 Certification	
	2.7 Permit Shield	
	2.8 Title I Conditions	
	2.9 Reopening and Revising Permit	
	2.10 Emissions Trading Programs	
	2.11 Permit Renewal	
	2.12 Permanent Shutdown	
	2.13 Startup, Shutdown, and Malfunction	
3	Source Requirements	12
	3.1 Applicable Requirements	
	3.2 Applicable Plans and Programs	
	3.3 Title I Requirements	
	3.4 Synthetic Minor Limits	
	3.5 Reporting Requirements	
4	Emission Unit Requirements	17
	4.1 Coating Lines	
	4.2 Drum Reclamation Furnace	
	4.3 Shot Blasters	
	4.4 Fuel Combustion Equipment	
	4.5 Storage Tank	
5	Additional Title I Requirements	49
6	Insignificant Activities Requirements	50
	6.1 Insignificant Activities Subject to Specific Regulations	
	6.2 Insignificant Activities in 35 IAC 201.210(a)	
	6.3 Insignificant Activities in 35 IAC 201.210(b)	
	6.4 Applicable Requirements	
	6.5 Compliance Method	
	6.6 Notification Requirements for Insignificant Activities	
7	Other Requirements	53
	7.1 Testing	
	7.2 PM Process Weight Rate Requirements	
	7.3 Emissions Reduction Market System (ERMS) Requirements	
	7.4 40 CFR 63 Subpart A Requirements (NESHAP)	
	7.5 Compliance Assurance Monitoring (CAM) Requirements	
	 7.6 Compliance Schedule Requirements	
8	State Only Requirements	65
	8.1 Permitted Emissions for Fees	
Attachment 1	List of Emission Units at This Source	66
Attachment 2	Acronyms and Abbreviations	67
Attachment 3	Contact and Reporting Addresses	69
Attachment 4	Example Certification by a Responsible Official	70

Section 1 - Source Information

1. Addresses

Source

Meyer Steel Drum, Inc.
3201 South Millard Avenue
Chicago, Illinois 60623

Owner

Meyer Steel Drum, Inc.
3201 South Millard Avenue
Chicago, Illinois 60623

Operator

Meyer Steel Drum, Inc.
3201 South Millard Avenue
Chicago, Illinois 60623

Permittee

The Owner and Operator of the source as identified in this table.

2. Contacts

Certified Officials

The source shall submit an Administrative Permit Amendment for any change in the Certified Officials, pursuant to Section 39.5(13) of the Act.

	<i>Name</i>	<i>Title</i>
<i>Responsible Official</i>	Edward Meyer	Secretary/Treasurer
<i>Delegated Authority</i>	No other individuals have been authorized by the IEPA.	N/A

Other Contacts

	<i>Name</i>	<i>Phone No.</i>	<i>Email</i>
<i>Source Contact</i>	Glenn Wentink	708/352-7730	grw.pe@att.net
<i>Technical Contact</i>	Glenn Wentink	708/352-7730	grw.pe@att.net
<i>Correspondence</i>	Ornella Joyner	773/376-8376	OJ@meyersteeldrum.com
<i>Billing</i>	Ornella Joyner	773/376-8376	OJ@meyersteeldrum.com

3. Single Source

The source identified in Condition 1.1 above shall be defined to include all the following additional source(s):

<i>I.D. No.</i>	<i>Permit No.</i>	<i>Single Source Name and Address</i>
N/A	N/A	N/A

Section 2 - General Permit Requirements

1. Prohibitions

- a. It shall be unlawful for any person to violate any terms or conditions of this permit issued under Section 39.5 of the Act, to operate the CAAPP source except in compliance with this permit issued by the IEPA under Section 39.5 of the Act or to violate any other applicable requirements. All terms and conditions of this permit issued under Section 39.5 of the Act are enforceable by USEPA and citizens under the Clean Air Act, except those, if any, that are specifically designated as not being federally enforceable in this permit pursuant to Section 39.5(7)(m) of the Act. [Section 39.5(6)(a) of the Act]
- b. After the applicable CAAPP permit or renewal application submittal date, as specified in Section 39.5(5) of the Act, the source shall not operate this CAAPP source without a CAAPP permit unless the complete CAAPP permit or renewal application for such source has been timely submitted to the IEPA. [Section 39.5(6)(b) of the Act]
- c. No Owner or Operator of the CAAPP source shall cause or threaten or allow the continued operation of an emission source during malfunction or breakdown of the emission source or related air pollution control equipment if such operation would cause a violation of the standards or limitations applicable to the source, unless this CAAPP permit granted to the source provides for such operation consistent with the Act and applicable Illinois Pollution Control Board regulations. [Section 39.5(6)(c) of the Act]
- d. Pursuant to Section 39.5(7)(g) of the Act, emissions from the source are not allowed to exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder, consistent with Section 39.5(17) of the Act and applicable requirements, if any.

2. Emergency Provisions

Pursuant to Section 39.5(7)(k) of the Act, the Owner or Operator of the CAAPP source may provide an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations under this CAAPP permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

- a.
 - i. An emergency occurred and the source can identify the cause(s) of the emergency.
 - ii. The source was at the time being properly operated.
 - iii. The source submitted notice of the emergency to the IEPA within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
 - iv. During the period of the emergency the source took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or requirements in this permit.
- b. For purposes of Section 39.5(7)(k) of the Act, "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, such as an act of God, that requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operation error.
- c. In any enforcement proceeding, the source seeking to establish the occurrence of an emergency has the burden of proof. This provision is in addition to any emergency or

upset provision contained in any applicable requirement. This provision does not relieve the source of any reporting obligations under existing federal or state laws or regulations.

3. General Provisions

a. Duty to Comply

The source must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. [Section 39.5(7) (o) (i) of the Act]

b. Need to Halt or Reduce Activity is not a Defense

It shall not be a defense for the source in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Section 39.5(7) (o) (ii) of the Act]

c. Duty to Maintain Equipment

The source shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements. [Section 39.5(7) (a) of the Act]

d. Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated there under. [Section 39.5(7) (a) of the Act]

e. Duty to Pay Fees

- i. The source must pay fees to the IEPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto. [Section 39.5(7) (o) (vi) of the Act]
- ii. The IEPA shall assess annual fees based on the allowable emissions of all regulated air pollutants, except for those regulated air pollutants excluded in Section 39.5(18) (f) of the Act and insignificant activities in Section 6, at the source during the term of this permit. The amount of such fee shall be based on the information supplied by the applicant in its complete CAAPP permit application. [Section 39.5(18) (a) (ii) (A) of the Act]
- iii. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois EPA, P.O. Box 19276, Springfield, IL, 62794-9276. Include on the check: ID #, Permit #, and "CAAPP Operating Permit Fees". [Section 39.5(18) (e) of the Act]

f. Obligation to Allow IEPA Surveillance

Pursuant to Sections 4(a), 39.5(7) (a), and 39.5(7) (p) (ii) of the Act, inspection and entry requirements that necessitate that, upon presentation of credentials and other documents as may be required by law and in accordance with constitutional limitations, the source shall allow the IEPA, or an authorized representative to perform the following:

- i. Enter upon the source's premises where the emission unit(s) are located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

Meyer Steel Drum, Inc.
I.D. No.: 031600APY
Permit No.: 95120079

Date Received: 9-8-2009
Date Issued: TBD

- ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.
- iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
- iv. Sample or monitor any substances or parameters at any location at reasonable times:
 - A. As authorized by the Clean Air Act or the Act, at reasonable times, for the purposes of assuring compliance with this CAAPP permit or applicable requirements; or
 - B. As otherwise authorized by the Act.
- v. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

g. Effect of Permit

- i. Pursuant to Section 39.5(7)(j)(iv) of the Act, nothing in this CAAPP permit shall alter or affect the following:
 - A. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section.
 - B. The liability of the Owner or Operator of the source for any violation of applicable requirements prior to or at the time of permit issuance.
 - C. The applicable requirements of the acid rain program consistent with Section 408(a) of the Clean Air Act.
 - D. The ability of USEPA to obtain information from the source pursuant to Section 114 (inspections, monitoring, and entry) of the Clean Air Act.
- ii. Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, pursuant to Sections 39.5(7)(j) and (p) of the Act, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements. [35 IAC 201.122 and Section 39.5(7)(a) of the Act]

h. Severability Clause

The provisions of this permit are severable. In the event of a challenge to any portion of this permit, other portions of this permit may continue to be in effect. Should any portion of this permit be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected and the rights and obligations of the source shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force. [Section 39.5(7)(i) of the Act]

4. <u>Testing</u>

- a. Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods if applicable test methods are not specified by the applicable regulations or otherwise identified in the conditions of this permit. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of

Meyer Steel Drum, Inc.
I.D. No.: 031600APY
Permit No.: 95120079

Date Received: 9-8-2009
Date Issued: TBD

any tests conducted as required by this permit or as the result of a request by the IEPA shall be submitted as specified in Condition 7.1 of this permit. [35 IAC Part 201 Subpart J and Section 39.5(7)(a) of the Act]

- b. Pursuant to Section 4(b) of the Act and 35 IAC 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
 - i. Testing by Owner or Operator: The IEPA may require the Owner or Operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the IEPA, at such reasonable times as may be specified by the IEPA and at the expense of the Owner or Operator of the emission source or air pollution control equipment. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The IEPA shall have the right to observe all aspects of such tests.
 - ii. Testing by the IEPA: The IEPA shall have the right to conduct such tests at any time at its own expense. Upon request of the IEPA, the Owner or Operator of the emission source or air pollution control equipment shall provide, without charge to the IEPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.

5. Recordkeeping

a. Control Equipment Maintenance Records

Pursuant to Section 39.5(7)(b) of the Act, a maintenance record shall be kept on the premises for each item of air pollution control equipment. At a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

b. Retention of Records

- i. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [Section 39.5(7)(e)(ii) of the Act]
- ii. Pursuant to Section 39.5(7)(a) of the Act, other records required by this permit including any logs, plans, procedures, or instructions required to be kept by this permit shall be retained for a period of at least 5 years from the date of entry unless a different period is specified by a particular permit provision.

c. Availability of Records

- i. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall retrieve and provide paper copies, or as electronic media, any records retained in an electronic format (e.g., computer) in response to an IEPA or USEPA request during the course of a source inspection.
- ii. Pursuant to Section 39.5(7)(a) of the Act, upon written request by the IEPA for copies of records or reports required to be kept by this permit, the Permittee shall promptly submit a copy of such material to the IEPA. For this purpose, material shall be submitted to the IEPA within 30 days unless additional time is provided by the IEPA or the Permittee believes that the volume and nature of requested material would make this overly burdensome, in which case, the Permittee

Meyer Steel Drum, Inc.
I.D. No.: 031600APY
Permit No.: 95120079

Date Received: 9-8-2009
Date Issued: TBD

shall respond within 30 days with the explanation and a schedule for submittal of the requested material. (See also Condition 2.9(d))

6. Certification

a. Compliance Certification

- i. Pursuant to Section 39.5(7)(p)(v)(C) of the Act, the source shall submit annual compliance certifications by May 1 unless a different date is specified by an applicable requirement or by a particular permit condition. The annual compliance certifications shall include the following:
 - A. The identification of each term or condition of this permit that is the basis of the certification.
 - B. The compliance status.
 - C. Whether compliance was continuous or intermittent.
 - D. The method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- ii. Pursuant to Section 39.5(7)(p)(v)(D) of the Act, all compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the IEPA Compliance Section. Addresses are included in Attachment 3.
- iii. Pursuant to Section 39.5(7)(p)(i) of the Act, all compliance reports required to be submitted shall include a certification in accordance with Condition 2.6(b).

b. Certification by a Responsible Official

Any document (including reports) required to be submitted by this permit shall contain a certification by the responsible official of the source that meets the requirements of Section 39.5(5) of the Act and applicable regulations. [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included in Attachment 4 of this permit.

7. Permit Shield

- a. Pursuant to Section 39.5(7)(j) of the Act, except as provided in Condition 2.7(b) below, the source has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the IEPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit. This permit shield does not extend to applicable requirements which are promulgated after **TBD** (date USEPA notice started), unless this permit has been modified to reflect such new requirements.
- b. Pursuant to Section 39.5(7)(j) of the Act, this permit and the terms and conditions herein do not affect the Permittee's past and/or continuing obligation with respect to statutory or regulatory requirements governing major source construction or modification under Title I of the CAA. Further, neither the issuance of this permit nor any of the terms or conditions of the permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.
- c. Pursuant to Section 39.5(7)(a) of the Act, the issuance of this permit by the IEPA does not and shall not be construed as barring, diminishing, adjudicating or in any way

Meyer Steel Drum, Inc.
I.D. No.: 031600APY
Permit No.: 95120079

Date Received: 9-8-2009
Date Issued: TBD

affecting any currently pending or future legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the IEPA or the USEPA may have against the applicant including, but not limited to, any enforcement action authorized pursuant to the provision of applicable federal and state law.

8. Title I Conditions

Pursuant to Sections 39(a), 39(f), and 39.5(7)(a) of the Act, as generally identified below, this CAAPP permit may contain certain conditions that relate to requirements arising from the construction or modification of emission units at this source. These requirements derive from permitting programs authorized under Title I of the Clean Air Act (CAA) and regulations thereunder, and Title X of the Illinois Environmental Protection Act (Act) and regulations implementing the same. Such requirements, including the New Source Review programs for both major (i.e., PSD and nonattainment areas) and minor sources, are implemented by the IEPA.

- a. This permit may contain conditions that reflect requirements originally established in construction permits previously issued for this source. These conditions include requirements from preconstruction permits issued pursuant to regulations approved or promulgated by USEPA under Title I of the CAA, as well as requirements contained within construction permits issued pursuant to state law authority under Title X of the Act. Accordingly, all such conditions are incorporated into this CAAPP permit by virtue of being either an "applicable Clean Air Act requirement" or an "applicable requirement" in accordance with Section 39.5 of the Act. These conditions are identifiable herein by a designation to their origin of authority.
- b. This permit may contain conditions that reflect necessary revisions to requirements established for this source in preconstruction permits previously issued under the authority of Title I of the CAA. These conditions are specifically designated herein as "TIR."
 - i. Revisions to original Title I permit conditions are incorporated into this permit through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.
 - ii. Revised Title I permit conditions shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.
- c. This permit may contain conditions that reflect new requirements for this source that would ordinarily derive from a preconstruction permit established under the authority of Title I of the CAA. These conditions are specifically designated herein as "TIN."
 - i. The incorporation of new Title I requirements into this CAAPP permit is authorized through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.
 - ii. Any Title I conditions that are newly incorporated shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.

9. Reopening and Revising Permit

a. Permit Actions

This permit may be modified, revoked, reopened and reissued, or terminated for cause in accordance with applicable provisions of Section 39.5 of the Act. The filing of a request by the source for a permit modification, revocation and reissuance, or

Meyer Steel Drum, Inc.
I.D. No.: 031600APY
Permit No.: 95120079

Date Received: 9-8-2009
Date Issued: TBD

termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [Section 39.5(7) (o) (iii) of the Act]

b. Reopening and Revision

Pursuant to Section 39.5(15) (a) of the Act, this permit must be reopened and revised if any of the following occur:

- i. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- ii. Additional requirements become applicable to the source for acid deposition under the acid rain program;
- iii. The IEPA or USEPA determines that this permit contains a material mistake or that an inaccurate statement was made in establishing the emission standards or limitations, or other terms or conditions of this permit; or
- iv. The IEPA or USEPA determines that this permit must be revised or revoked to ensure compliance with the applicable requirements.

c. Inaccurate Application

Pursuant to Sections 39.5(5) (e) and (i) of the Act, the IEPA has issued this permit based upon the information submitted by the source in the permit application referenced on page 1 of this permit. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation or reopening of this CAAPP under Section 39.5(15) of the Act.

d. Duty to Provide Information

The source shall furnish to the IEPA, within a reasonable time specified by the IEPA any information that the IEPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the source shall also furnish to the IEPA copies of records required to be kept by this permit. [Section 39.5(7) (o) (v) of the Act]

10. Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement. [Section 39.5(7) (o) (vii) of the Act]

11. Permit Renewal

- a. Upon the expiration of this permit, if the source is operated, it shall be deemed to be operating without a permit unless a timely and complete CAAPP application has been submitted for renewal of this permit. However, if a timely and complete application to renew this CAAPP permit has been submitted, the terms and all conditions of the most recent issued CAAPP permit will remain in effect until the issuance of a renewal permit. [Sections 39.5(5) (l) and (o) of the Act]
- b. For purposes of permit renewal, a timely application is one that is submitted no less than 9 months prior to the date of permit expiration. [Section 39.5(5) (n) of the Act]

12. Permanent Shutdown

Pursuant to Section 39.5(7) (a) of the Act, this permit only covers emission units and control equipment while physically present at the source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item

Meyer Steel Drum, Inc.
I.D. No.: 031600APY
Permit No.: 95120079

Date Received: 9-8-2009
Date Issued: TBD

of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

13. Startup, Shutdown, and Malfunction

Pursuant to Section 39.5(7) (a) of the Act, in the event of an action to enforce the terms or conditions of this permit, this permit does not prohibit a Permittee from invoking any affirmative defense that is provided by the applicable law or rule.

Section 3 - Source Requirements

1. Applicable Requirements

Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements. These requirements are applicable to all emission units (including insignificant activities unless specified otherwise in this Section) at the source.

a. Fugitive Particulate Matter

- i. Pursuant to 35 IAC 212.301 and 35 IAC 212.314, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source unless the wind speed is greater than 25 mph.

- ii. Compliance Method (Fugitive Particulate Matter)

Upon request by the IEPA, the Permittee shall conduct observations at the property line of the source for visible emissions of fugitive particulate matter from the source to address compliance with 35 IAC 212.301. For this purpose, daily observations shall be conducted for a week for particular area(s) of concern at the source, as specified in the request, observations shall begin either within one day or three days of receipt of a written request from the IEPA, depending, respectively, upon whether observations will be conducted by employees of the Permittee or a third-party observer hired by the Permittee to conduct observations on its behalf. The Permittee shall keep records for these observations, including identity of the observer, the date and time of observations, the location(s) from which observations were made, and duration of any fugitive emissions event(s).

b. Emissions Reduction Market System (ERMS)

- i. Pursuant to 35 IAC Part 205, this source is considered a "participating source" for purposes of the ERMS. The allotment of ATUs to this source is 307 ATUs per seasonal allotment period. The Permittee shall comply with all applicable requirements in Section 7.3 of this permit.

c. Ozone Depleting Substances

Pursuant to 40 CFR 82.150(b), the Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- i. Pursuant to 40 CFR 82.156, persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices.
- ii. Pursuant to 40 CFR 82.158, equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment.
- iii. Pursuant to 40 CFR 82.161, persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program.
- iv. Pursuant to 40 CFR 82 Subpart B, any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner shall comply with 40 CFR 82 Subpart B, Servicing of Motor Vehicle Air Conditioners.

- v. Pursuant to 40 CFR 82.166, all persons shall comply with the reporting and recordkeeping requirements of 40 CFR 82.166.

d. Asbestos Demolition and Renovation

- i. Asbestos Fees. Pursuant to Section 9.13(a) of the Act, for any site for which the Owner or Operator must file an original 10-day notice of intent to renovate or demolish pursuant to Condition 3.1(d)(ii) below and 40 CFR 61.145(b), the owner or operator shall pay to the IEPA with the filing of each 10-day notice a fee of \$150.
- ii. Pursuant to 40 CFR 61 Subpart M, Standard of Asbestos, prior to any demolition or renovation at this facility, the Permittee shall fulfill notification requirements of 40 CFR 61.145(b).
- iii. Pursuant to 40 CFR 61.145(c), during demolition or renovation, the Permittee shall comply with the procedures for asbestos emission control established by 40 CFR 61.145(c).

e. NESHAP Standards (40 CFR 63 Subpart DDDDD)

Pursuant to 40 CFR 63.7495(b), no later than March 21, 2014, the source must:

- i. Meet the applicable general provisions of 40 CFR 63 Subpart A. See Condition 7.4(a).
- ii. Have a one-time energy assessment performed on the source as specified in 40 CFR 63 Subpart DDDDD Table 3 Condition 3, pursuant to 40 CFR 63.7500(a)(1).

f. Future Emission Standards

Pursuant to Section 39.5(15)(a) of the Act, this source shall comply with any new or revised applicable future standards of 40 CFR 60, 61, 62, or 63; or 35 IAC Subtitle B after the date issued of this permit. The Permittee shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by Condition 2.6(a). This permit may also have to be revised or reopened to address such new regulations in accordance to Condition 2.9.

2. Applicable Plans and Programs

Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements. These requirements are applicable to all emission units (including insignificant activities unless specified otherwise in this Section) at the source.

a. Fugitive PM Operating Program

- i. Pursuant to 35 IAC 212.309, this source shall be operated under the provisions of Fugitive PM Operating Program prepared by the Permittee and submitted to the IEPA for its review. The Fugitive PM Operating Program shall be designed to significantly reduce fugitive particulate matter emissions, pursuant to 35 IAC 212.309(a). The Permittee shall comply with the Fugitive PM Operating Program and any amendments to the Fugitive PM Operating Program submitted pursuant to Condition 3.2(a)(ii). As a minimum, the Fugitive PM Operating Program shall include provisions identified in 35 IAC 212.310(a) through (g) and the following:
 - A. A detailed description of the best management practices utilized to achieve compliance with 35 IAC 212.304 through 212.308.
 - B. Estimated frequency of application of dust suppressants by location.

Meyer Steel Drum, Inc.
I.D. No.: 031600APY
Permit No.: 95120079

Date Received: 9-8-2009
Date Issued: TBD

- C. Such other information as may be necessary to facilitate the IEPA's review of the Fugitive PM Operating Program.
- ii. Pursuant to 35 IAC 212.312, the Fugitive PM Operating Program shall be amended from time to time by the Permittee so that the Fugitive PM Operating Program is current. Such amendments shall be consistent with the requirements set forth by this Condition 3.2(a) and shall be submitted to the IEPA within 30 days of such amendment. Any future revision to the Fugitive PM Operating Program made by the Permittee during the permit term is automatically incorporated by reference provided the revision is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the revision. In the event that the IEPA notifies the Permittee of a deficiency with any revision to the Fugitive PM Operating Program, the Permittee shall be required to revise and resubmit the Fugitive PM Operating Program within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7) (a) of the Act.
- iii. The Fugitive PM Operating Program (revision), as submitted by the Permittee on May 6, 2013, is incorporated herein by reference. The document constitutes the formal Fugitive PM Operating Program required under 35 IAC 212.310, addressing the control of fugitive particulate matter emissions from all plant roadways, including other subject operations located at the facility that are subject to 35 IAC 212.309.
- iv. Pursuant to Section 39.5(7) (b) of the Act, the Permittee shall keep a copy of the Fugitive PM Operating Program, any amendments or revisions to the Fugitive PM Operating Program (as required by Condition 3.2(a)), and the Permittee shall also keep a record of activities completed according to the Fugitive PM Operating Program.

b. Episode Action Plan

- i. Pursuant to 35 IAC 244.141, the Permittee shall have on file with the IEPA an Episode Action Plan for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The Episode Action Plan shall contain the information specified in 35 IAC 244.144.
- ii. The Permittee shall immediately implement the appropriate steps described in the Episode Action Plan should an air pollution alert or emergency be declared, as required by 35 IAC 244.169, or as may otherwise be required under 35 IAC 244, Appendix D.
- iii. Pursuant to 35 IAC 244.143(d), if an operational change occurs at the source which invalidates the Episode Action Plan, a revised Episode Action Plan shall be submitted to the IEPA for review within 30 days of the change and is automatically incorporated by reference provided the revision is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the revision. In the event that the IEPA notifies the Permittee of a deficiency with any revision to the Episode Action Plan, the Permittee shall be required to revise and resubmit the Episode Action Plan within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7) (a) of the Act.
- iv. The Episode Action Plan, as submitted by the Permittee on April 11, 2013, is incorporated herein by reference. The document constitutes the formal Episode Action Plan required by 35 IAC 244.142, addressing the actions that will be implemented to reduce SO₂, PM₁₀, NO₂, CO and VOM emissions from various emissions units in the event of a yellow alert, red alert or emergency issued under 35 IAC 244.161 through 244.165.
- v. Pursuant to Section 39.5(7) (b) of the Act, the Permittee shall keep a copy of the Episode Action Plan, any amendments or revisions to the Episode Action Plan (as

required by Condition 3.2(c)), and the Permittee shall also keep a record of activities completed according to the Episode Action Plan.

4. Non-Applicability Determinations

- a. PM10 Contingency Measure Plan
 - i. The source is not subject to 35 IAC Subpart U: Additional Control Measures because the source is not located in or subject to 35 IAC 212.324(a)(1) or 35 IAC 212.423(a).
 - ii. Should this source become subject to 35 IAC 212.700, then the Permittee shall prepare and operate under a PM10 Contingency Measure Plan reflecting the PM10 emission reductions as set forth in 35 IAC 212.701 and 212.703. The Permittee shall, within 90 days after the date this source becomes subject to 35 IAC 212.700, submit a request to modify this CAAPP permit in order to include a new, appropriate PM10 Contingency Measure Plan.
- b. Risk Management Plan (RMP)
 - i. The source is not subject to 40 CFR Part 68: Chemical Accident Prevention Provisions because the source does not have any covered processes as defined by 40 CFR 68.3.
 - ii. Should this source become subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68, then the Permittee shall submit a compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or submit a certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan, as part of the annual compliance certification required by Condition 2.6(a). This condition is imposed in this permit pursuant to 40 CFR 68.215(a)(2)(i) and (ii).

5. Title I Requirements

As of the date of issuance of this permit, there are no source-wide Title I requirements that need to be included in this Condition.

6. Synthetic Minor Limits

As of the date of issuance of this permit, there are no source-wide synthetic minor limits that need to be included in this Condition.

7. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows:
 - I. Requirements in Conditions 3.1(a)(i), 3.1(b), 3.1(e), and 3.1(f).
 - II. Requirements in Conditions 3.2(a).

- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.
- iv. All deviation reports required in this Permit shall be identified, summarized, and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

b. Semiannual Reporting

- i. Pursuant to Section 39.5(7)(f)(i) of the Act, the Permittee shall submit Semiannual Monitoring Reports to the IEPA, Air Compliance Section, summarizing required monitoring as part of the Compliance Methods in this Permit submitted every six months as follows, unless more frequent reporting is required in other parts of this permit.

<u>Monitoring Period</u>	<u>Report Due Date</u>
January through June	September 1
July through December	March 1

- ii. The Semiannual Monitoring Report must be certified by a Responsible Official consistent with Condition 2.6(b).

c. Annual Emissions Reporting

Pursuant to 35 IAC Part 254, the Source shall submit an Annual Emission Report due by May 1 of the year following the calendar year in which the emissions took place. All records and calculations upon which the verified and reported data are based must be retained by the source.

Section 4 - Emission Unit Requirements

4.1 Coating Lines

1. Emission Units and Operations					
Emission Units	Pollutants Being Regulated	Original Construction Date	Modification/ Reconstruction Date	Air Pollution Control Devices or Measures	Monitoring Devices
Coating Line #1 (Interior Coating Line with Spray Booth SPB-1 and Steam Flash Oven FO-1)	VOM, PM, SO ₂ , HAP	1991	N/A	Filter (AF-1)	Differential Air Manometer
				Regenerative Thermal Oxidizer	Continuous Temperature Monitor/Recorder
Coating Line #2 (Primer Coating Line with Coating Booth SPB-2 and Curing Oven CO-1)	VOM, PM, SO ₂ , HAP	1991	N/A	Filter (AF-2)	Differential Air Manometer
				Regenerative Thermal Oxidizer	Continuous Temperature Monitor/Recorder
Coating Line #3 (Exterior Coating Line with Coating Booth SPB-3 and Curing Oven CO-2)	VOM, PM, SO ₂ , HAP	1991	N/A	Filter (AF-3)	Differential Air Manometer
				Regenerative Thermal Oxidizer	Continuous Temperature Monitor/Recorder
Coating Line #4 (Interior Coating Line with Spray Booth SPB-4 and Steam Flash Oven FO-1)	VOM, PM, SO ₂ , HAP	1991	N/A	Water Wall (WW-1)	None
				Regenerative Thermal Oxidizer	Continuous Temperature Monitor/Recorder
Coating Line #5 (Exterior Coating Line with Coating Booth SPB-5 and Curing Oven CO-2)	VOM, PM, SO ₂ , HAP	1991	N/A	Water Wall (WW-2)	None
				Regenerative Thermal Oxidizer	Continuous Temperature Monitor/Recorder
Coating Line #6 (Exterior Coating Line with Coating Booth SPB-6 and Curing Oven CO-3)	VOM, PM, SO ₂ , HAP	1991	N/A	Filter (AF-4)	Differential Air Manometer
				Regenerative Thermal Oxidizer	Continuous Temperature Monitor/Recorder
Coating Line #7 (Ring Dip Coating Line with Dip Coater DC-1 and Curing Oven CO-2)	VOM, PM, SO ₂ , HAP	1991	N/A	Regenerative Thermal Oxidizer	Continuous Temperature Monitor/Recorder

2. Applicable Requirements

For the emission units in Condition 4.1.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act as well as 40 CFR Subpart M - Miscellaneous Metal Parts and Products Coating Operations.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122.

ii. Compliance Method (Opacity Requirements)

Monitoring

Meyer Steel Drum, Inc.
I.D. No.: 031600APY
Permit No.: 95120079

Date Received: 9-8-2009
Date Issued: TBD

- A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for visible emissions on the common stack of the RTO in accordance with Method 22 for visible emissions at least semi-annually. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the coating lines, maintenance and repair, and/or adjustment of fuel usage. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within 7 days in accordance with Condition 2.4.

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep records for each opacity observation performed. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.
- C. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep records for all Method 9 opacity measurements made in accordance with Condition 4.1.2(a)(ii)(A) above.

b. i. Particulate Matter Requirements (PM)

- A. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c). See Condition 7.2(a).

ii. Compliance Method (PM Requirements)

Monitoring

- A. Pursuant to Section 39.5(7)(b) and (d) of the Act, the Permittee shall perform weekly inspections of each of the filters AF1 through 4.
- B. Pursuant ~~to~~ Section 39.5(7)(a) of the Act, the Permittee shall change the filters ~~no~~ less frequently than weekly.
- C. Additional sufficient periodic monitoring to determine solids content of coatings is established in Condition 4.1.2(d)(ii)(D).

Recordkeeping

- D. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep monthly and annual records of the solids content in applied coatings at each spray booth.
- E. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep monthly and annual records of actual emissions of PM from each spray booth, with supporting calculations including hours of operation of each spray booth, along with calculations of allowable emissions to show compliance with the hourly emissions allowed by 35 IAC 212.321(a).

F. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep a log of the control device (filters) inspections, maintenance and replacements.

c. i. **Sulfur Dioxide Requirements (SO₂)**

A. Pursuant to 35 IAC 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from curing ovens CO-1 through 3 to exceed 2000 ppm.

ii. **Compliance Method (SO₂ Requirements)**

Recordkeeping

A. Pursuant to Section 39.5(7)(b) and (d) of the Act, for natural gas-fired cure ovens, the Permittee shall keep records to demonstrate that the natural gas quality is equal to pipeline quality natural gas as required by Condition 4.1.2(h) (i) (C).

d. i. **Volatile Organic Material Requirements (VOM)**

A. Pursuant to 35 IAC 218.204(q) (1) (X) and (q) (1) (Y), the VOM content in the drum coatings shall not exceed the following limits:

I. Drum Coating, reconditioned, exterior: 0.42 kg/l (3.5 lb/gal)

II. Drum coating, reconditioned, interior: 0.50 kg/l (4.2 lb/gal)

B. Pursuant to 35 IAC 218.204(q) (1) (X) and (q) (1) (Y), the solids content in the drum coatings shall not exceed the following limits:

I. Drum Coating, reconditioned, exterior: 0.80 kg/l (6.67 lb/gal)

II. Drum coating, reconditioned, interior: 1.17 kg/l (9.78 lb/gal)

C. Pursuant to 35 IAC 218.204, the emission limitations in Condition 4.1.2(d) (i) (A) are expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator, except where noted. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition.

D. Pursuant to 35 IAC 218.206, limitations in terms of kg (lbs) of VOM emissions per 1 (gal) of solids as applied at each coating applicator shall be determined by the equation determined by 35 IAC 218.206.

E. Pursuant to Permit 90060034, VOM emissions from the source-wide coating and cleanup operations, i.e. spray booths SPB-1 through SPB-6 and dip coater DC-1 shall not exceed 12.0 tons/month and 97.7 tons/year. [T1]

F. Pursuant to 39.5(7) (a) of the Act, the Permittee shall comply with the Compliance Schedule requirements in Condition 7.6.

ii. **Compliance Method (VOM Requirements)**

Testing

A. Pursuant to Section 39.5(7) (b) and (d) of the Act, the Permittee shall perform an emissions test for VOM emissions from SPB-1 through SPB-6 and DC-1 at least every 5 years using Reference Method 25 or 25A. The Permittee must also comply with the requirements in Condition 7.1.

Monitoring

- B. Pursuant to Permit 90060034, compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- C. Pursuant to 35 IAC 218.105(a), 218.211(a), and Section 39.5(7)(b) of the Act, testing for VOM content and solids content of coatings and cleanup solvents shall be performed as follows:
- I. On an annual basis, the VOM content of coatings "as applied" on each coating line shall be determined according to Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a).
 - II. The VOM content of the cleaning solvents used on each coating line shall be tested annually according to Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a), 218.208, and 218.211(a).
 - III. This testing may be performed by the supplier of a material provided that the supplier provides documentation for such testing to the Permittee and the Permittee's records directly reflect the application of such material and separately account for any additions of solvent [35 IAC 218.105(a), 218.208, and 218.211(a)].
- D. Pursuant to 39.5(7)(a) of the Act, the Permittee shall not use any new or modified coating until all the documentation required by Condition 4.1.2(d)(ii)(C) to demonstrate the coating is in compliance with Conditions 4.1.2(d)(i)(A) and (B).
- E. Pursuant to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, the coating lines are subject to 40 CFR Part 64. The Permittee shall comply with the monitoring requirements of the CAM Plan described in Condition 7.5 and Table 7.5.1, pursuant to 40 CFR Part 64 as submitted in the Permittee's CAM plan application. At all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment, pursuant to 40 CFR 64.7(a) and (b).

Recordkeeping

- F. Pursuant to Section 35 IAC 218.211(c) of the Act, the Permittee shall collect and record all of the following information each day, unless otherwise specified, for each coating line and maintain the information at the source for a period of three years:
- I. The name and identification number of each coating as applied on each coating line;
 - II. The weight of VOM per volume of each coating (minus water and any compounds that are specifically exempted from the definition of VOM) as applied each day on each coating line;
 - III. For coating lines subject to the limitations of 35 IAC 218.204(q), the weight of VOM per volume of each coating, or the weight of VOM per volume of solids in each coating, as applicable, as applied each day on each coating line, and certified product data sheets for each coating.

e. i. **Carbon Monoxide Requirements (CO)**

Meyer Steel Drum, Inc.
I.D. No.: 031600APY
Permit No.: 95120079

Date Received: 9-8-2009
Date Issued: TBD

- A. Pursuant to Permit 06030011, emissions of carbon monoxide (CO) from the RTO shall not exceed the 0.30 lb/hour and 1.29 tons/year. [T1]
- B. Pursuant to 39.5(7) (a) of the Act, the Permittee shall comply with the Compliance Schedule requirements in Condition 7.6.

ii. Compliance Method (CO Requirements)

Testing

- A. Pursuant to Section 39.5(7) (b) and (d) of the Act, the Permittee shall perform an emissions test for CO at least every 5 years using Reference Method 10. The Permittee must also comply with the requirements in Condition 7.1.

Recordkeeping

- B. Pursuant to Section 39.5(7) (b) and (e) of the Act, the Permittee shall maintain records of the CO emissions from the RTO including supporting calculations (tons/month and tons/year).

f. i. Nitrogen Oxide Requirements (NO_x)

- A. Pursuant to Permit 06030011, emissions of nitrogen oxides (NO_x) from the RTO shall not exceed 0.35 lb/hour and 1.53 tons/year. [T1]

ii. Compliance Method (NO_x Requirements)

Recordkeeping

- A. Pursuant to Section 39.5(7) (b) of the Act, the Permittee shall maintain records of the NO_x emissions from the RTO including supporting calculations (tons/month and tons/year).

g. i. Hazardous Air Pollutant Requirements (HAP)

The source is subject to the requirements of 40 CFR 63 Subpart M National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products. The Permittee shall comply with the following limits for the different coatings in use for metal surface coating:

- A. Pursuant to 40 CFR 63.3890(b) (1), HAP content in each general use coating shall not exceed 0.31 kg (2.6 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period [40 CFR 63.3890(b) (1)];
- B. Pursuant 40 CFR 63.3890(b) (2), HAP content in each high performance coating shall not exceed 3.3 kg (27.5 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period [40 CFR 63.3890(b) (2)]; and
- C. Pursuant 40 CFR 63.3890(b) (5), HAP content in each extreme performance fluoropolymer coating shall not exceed 1.5 kg (12.4 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period [40 CFR 63.3890(b) (5)].

ii. Compliance Method (HAP Requirements)

Monitoring

A. Pursuant to 40 CFR 63.3891, The Permittee must include all coatings (as defined in 40 CFR 63.3981), thinners and/or other additives, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in 40 CFR 63.3890. To make this determination, The Permittee must use at least one of the three compliance options listed in paragraphs (I) through (III) of this condition. The Permittee may apply any of the compliance options to an individual coating operation, or to multiple coating operations as a group, or to the entire affected source. The Permittee may use different compliance options for different coating operations or at different times on the same coating operation. The Permittee may employ different compliance options when different coatings are applied to the same part, or when the same coating is applied to different parts. However, the Permittee may not use different compliance options at the same time on the same coating operation.

I. **Compliant material option.** The Permittee shall demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit in 40 CFR 63.3890, and that each thinner and/or other additive, and cleaning material used contains no organic HAP. The Permittee must meet all the requirements of 40 CFR 63.3940, 63.3941, and 63.3942 to demonstrate compliance with the applicable emission limit using this option.

1. Pursuant to 40 CFR 63.3942(a), for each compliance period to demonstrate continuous compliance, the Permittee must use no coating for which the organic HAP content (determined using Equation 2 of 40 CFR 63.3941) exceeds the applicable emission limit in 40 CFR 63.3890, and use no thinner and/or other additive, or cleaning material that contains organic HAP, determined according to 40 CFR 63.3941(a). A compliance period consists of 12 months. Each month, after the end of the initial compliance period described in 40 CFR 63.3940, is the end of a compliance period consisting of that month and the preceding 11 months.
2. Pursuant to 40 CFR 63.3942(b), if the Permittee chooses to comply with the emission limitations by using the compliant material option, the use of any coating, thinner and/or other additive, or cleaning material that does not meet the criteria specified above is a deviation from the emission limitations that must be reported as specified in 40 CFR 63.3910(c)(6) and 63.3920(a)(5).

II. **Emission rate without add-on controls option.** The Permittee shall demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit in 40 CFR 63.3890, calculated as a rolling 12-month emission rate and determined on a monthly basis. The Permittee must meet all the requirements of 40 CFR 63.3950, 63.3951, and 63.3952 to demonstrate compliance with the emission limit using this option.

1. Pursuant to 40 CFR 63.3952(a), to demonstrate continuous compliance, the organic HAP emission rate for each compliance period, determined according to 40 CFR 63.3951(a) through (g), must be less than or equal to the applicable emission limit in 40 CFR 63.3890. A compliance period consists of 12 months. Each month after the end of the initial compliance period described

in 40 CFR 63.3950 is the end of a compliance period consisting of that month and the preceding 11 months. The Permittee must perform the calculations in 40 CFR 63.3951(a) through (g) on a monthly basis using data from the previous 12 months of operation.

2. Pursuant to 40 CFR 63.3952(b), if the organic HAP emission rate for any 12-month compliance period exceeded the applicable emission limit in 40 CFR 63.3890, this is a deviation from the emission limitation for that compliance period and must be reported as specified in 40 CFR 63.3910(c)(6) and 40 CFR 63.3920(a)(6).

III. Emission rate with add-on controls option. The Permittee shall demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), and the emissions reductions achieved by emission capture systems and add-on controls, the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit in 40 CFR 63.3890, calculated as a rolling 12-month emission rate and determined on a monthly basis. If the Permittee uses this compliance option, the Permittee must also demonstrate that all emission capture systems and add-on control devices for the coating operation(s) meet the operating limits required in 40 CFR 63.3892, except for solvent recovery systems for which the Permittee conducts liquid-liquid material balances according to 40 CFR 63.3961(j), and that the Permittee meets the work practice standards required in 40 CFR 63.3893. The Permittee must meet all the requirements of 40 CFR 63.3960 through 63.3968 to demonstrate compliance with the emission limits, operating limits, and work practice standards using this option.

1. Pursuant to 40 CFR 63.3963(a), to demonstrate continuous compliance with the applicable emission limit in 40 CFR 63.3890, the organic HAP emission rate for each compliance period, determined according to the procedures in 40 CFR 63.3961, must be equal to or less than the applicable emission limit in 40 CFR 63.3890. A compliance period consists of 12 months. Each month after the end of the initial compliance period described in 40 CFR 63.3960 is the end of a compliance period consisting of that month and the preceding 11 months. The Permittee must perform the calculations in 40 CFR 63.3961 on a monthly basis using data from the previous 12 months of operation.
2. Pursuant to 40 CFR 63.3963(b), if the organic HAP emission rate for any 12-month compliance period exceeded the applicable emission limit in 40 CFR 63.3890, this is a deviation from the emission limitation for that compliance period that must be reported as specified in 40 CFR 63.3910(c)(6) and 40 CFR 63.3920(a)(7).
3. Pursuant to 40 CFR 63.3963(c), the Permittee must demonstrate continuous compliance with each operating limit required by 40 CFR 63.3892 that applies to this source, as specified in Table 1 of 40 CFR 63 Subpart Mmmm, when the coating lines are in operation.
 - a. Pursuant to 40 CFR 63.3963(c)(1), if an operating parameter is out of the allowed range specified in Table 1 of 40 CFR 63 Subpart Mmmm, this is a deviation from

the operating limit that must be reported as specified in 40 CFR 63.3910(c) (6) and 40 CFR 63.3920(a) (7).

- b. Pursuant to 40 CFR 63.3963(c) (2), if an operating parameter deviates from the operating limit specified in Table 1 to this subpart, then the Permittee must assume that the emission capture system and add-on control device were achieving zero efficiency during the time period of the deviation, unless the Permittee has other data indicating the actual efficiency of the emission capture system and add-on control device and the use of these data is approved by the IEPA.

Recordkeeping

- B. Pursuant to 40 CFR 63.3930(a), The Permittee shall retain a copy of each notification and report that the Permittee submitted to comply with 40 CFR 63 Subpart MMMM, and the documentation supporting each notification and report.
- C. Pursuant to 40 CFR 63.3930(b), The Permittee shall retain a current copy of information provided by material suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating. If the Permittee conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, the Permittee must keep a copy of the complete test report. If the Permittee uses information provided to the Permittee by the manufacturer or supplier of the material that was based on testing, the Permittee must keep the summary sheet of results provided to the Permittee by the manufacturer or supplier. The Permittee is not required to obtain the test report or other supporting documentation from the manufacturer or supplier.
- D. Pursuant to 40 CFR 63.3930(c), for each compliance period, the Permittee shall retain the records specified below.
 - I. Pursuant to 40 CFR 63.3930(c) (1), a record of the coating operations on which the Permittee used each compliance option and the time periods (beginning and ending dates and times) for each option the Permittee used.
 - II. Pursuant to 40 CFR 63.3930(c) (2), for the compliant material option, a record of the calculation of the organic HAP content for each coating, using Equation 2 of 40 CFR 63.3941.
 - III. Pursuant to 40 CFR 63.3930(c) (3), for the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1, 1A through 1C, and 2 of 40 CFR 63.3951; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to 40 CFR 63.3951(e) (4); the calculation of the total volume of coating solids used each month using Equation 2 of 40 CFR 63.3951; and the calculation of each 12-month organic HAP emission rate using Equation 3 of 40 CFR 63.3951.
 - IV. Pursuant to 40 CFR 63.3930(c) (4), for the emission rate with add-on controls option records of the calculations specified in 40 CFR 63.3930(c) (4) (i) through (v).

- E. Pursuant to 40 CFR 63.3930(d), the Permittee shall keep a record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the Permittee is using the compliant material option for all coatings at the source, the Permittee may maintain purchase records for each material used rather than a record of the volume used.
- F. Pursuant to 40 CFR 63.3930(e), the Permittee shall keep a record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period unless the material is tracked by weight.
- G. Pursuant to 40 CFR 63.3930(f), the Permittee shall keep a record of the volume fraction of coating solids for each coating used during each compliance period.
- H. Pursuant to 40 CFR 63.3930(g), for the emission rate without add-on controls or the emission rate with add-on controls compliance option the Permittee shall keep a record of the density for each coating, thinner and/or other additive, and cleaning material used during each compliance period.
- I. Pursuant to 40 CFR 63.3930(h), if the Permittee uses an allowance in Equation 1 of 40 CFR 63.3951 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to 40 CFR 63.3951(e)(4), the Permittee must keep records of the information specified below:
 - I. Pursuant to 40 CFR 63.3930(h)(1), the name and address of each TSDF to which the Permittee sent waste materials for which the Permittee uses an allowance in Equation 1 of 40 CFR 63.3951; a statement of which subparts under 40 CFR parts 262, 264, 265, and 266 apply to the facility; and the date of each shipment.
 - II. Pursuant to 40 CFR 63.3930(h)(2), identification of the coating operations producing waste materials included in each shipment and the month or months in which the Permittee used the allowance for these materials in Equation 1 of 40 CFR 63.3951.
 - III. Pursuant to 40 CFR 63.3930(h)(3), the methodology used in accordance with 40 CFR 63.3951(e)(4) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each month; and the methodology to determine the mass of organic HAP contained in these waste materials. This must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment.
- J. Pursuant to 40 CFR 63.3930(j), the Permittee must keep records of the date, time, and duration of each deviation.
- K. Pursuant to 40 CFR 63.3931(a), the records must be in a form suitable and readily available for expeditious review, according to 40 CFR 63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database.
- L. Pursuant to 40 CFR 63.3931(b) and 40 CFR 63.10(b)(1), the Permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

- M. Pursuant to 40 CFR 63.3931(c), the Permittee shall keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to 40 CFR 63.10(b)(1). The Permittee may keep the records off-site for the remaining 3 years.

h. i. Operational and Production Requirements


- A. Pursuant to Permit 06030011, The maximum firing rate of the RTO shall not exceed 3.5 mmBtu/hour. [T1]
- B. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall use only pipeline quality natural gas during operation of curing ovens associated with the coating lines or keep on file a document from the gas company certifying the sulfur content in the supplied natural gas does not exceed 2000 ppm.
- C. Pursuant to Permit 06030011, the only fuel fired in the RTO shall be pipeline quality natural gas. [T1]
- D. Pursuant to Permit 06030011, at all times, including periods of startup, shutdown, and malfunction, the Permittee shall to the extent practicable operate the RTO system, including the capture ductwork, in a manner consistent with good air pollution control practices for minimizing emissions. At minimum, these practices shall include the following:
- I. The RTO combustion chamber shall be preheated to at least 1600°F (the manufacturer's recommended temperature) prior to venting any coating operations to the RTO system. [T1]
- II. During normal operation, the RTO combustion chamber temperature shall be maintained at a temperature of 1600°F determined on a block hourly average. [T1]
- III. The Permittee shall operate the RTO system in accordance with written procedures developed and maintained for the operation of the system. Among other matters, these procedures shall specify the preheat and operating temperatures, as required above, and the set point temperature(s) for the RTO. [T1]
- E. Pursuant to Permit 06030011, the RTO unit shall be equipped with a continuous monitoring device for combustion chamber temperature.
- F. Pursuant to Permit 06030011, the combustion chamber temperature monitoring device shall be calibrated quarterly and maintained (according to vendor's specifications) at least monthly. [T1]
- G. Pursuant to Permit 06030011, the combustion chamber temperature monitoring device shall be operated at all times that the RTO is in use. This device shall display current temperature and keep a record of average data on an hourly basis. [T1]
- H. Pursuant to Permit 06030011, the Permittee shall, inspect the RTO, including the capture ductwork, on a quarterly basis and perform maintenance as determined necessary from the inspection, to keep the system in proper working condition. [T1]
- I. Pursuant to Permit 06030011, the Permittee shall operate the Regenerative Thermal Oxidizer (RTO) unit at all times when any single or multiple combination of coating lines or curing ovens are in operation. [T1]

ii. Compliance Method (Operational and Production Requirements)

Testing

- A. I. Pursuant to Section 39.5(7)(b) and (d) of the Act, the Permittee shall perform an emissions test for control efficiency of the RTO at least every 5 years using Reference Method 25 or 25A to measure both inlet and outlet VOM concentration. The Permittee must also comply with the requirements in Condition 7.1.
- II Pursuant to Section 39.5(7)(b) and (d) of the Act, the Permittee shall perform an emissions test for capture efficiency of the RTO ductwork at least every 5 years using Reference Method 204. The Permittee must also comply with the requirements in Condition 7.1.

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall maintain records of any changes made to coating line(s) or related equipment.
-  C. Pursuant to Section 39.5(7)(b) and (e) of the Act, a copy of the procedures for operation of the RTO shall be kept in the control room for the RTO system.
- D. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall maintain records of the type of fuel fired in the RTO.
- E. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep a file that contains the master copy of the written procedures for operation of the RTO system required by Condition 4.1.2(h)(i)(D)(III) and a copy of the manufacturer's and vendor's recommendations for operation and maintenance of the RTO system.
- F. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall maintain the following records each day:
- I. An operating log of the RTO system, curing ovens and capture ductwork.
- II. The hours of operation of the RTO (hours/month and hours/year).
- III. The block hourly average temperature of the RTO combustion chamber.
- G. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep a maintenance log for the capture system and RTO detailing all routine and non-routine maintenance performed, including dates and duration of any outages.

i. i. Work Practice Requirements

- A. Pursuant to 35 IAC 218.219(b)(1) through (6), the Permittee shall:
- I. Store all VOM-containing coatings, thinners, coating-related waste materials, cleaning materials, and used shop towels in closed containers;
- II. Ensure that mixing and storage containers used for VOM-containing coatings, thinners, coating-related waste materials, and cleaning materials are kept closed at all times except when depositing or removing these materials;

- III. Minimize spills of VOM-containing coatings, thinners, coating-related waste materials, and cleaning materials;
- IV. Convey VOM-containing coatings, thinners, coating-related waste materials, and cleaning materials from one location to another in closed containers or pipes;
- V. Minimize VOM emissions from cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers;
- VI. Apply all coatings using a High Volume Low Pressure (HVLV) spray application method for SPB-1 through SPB-6; and
- VII. Apply all coatings using dip coating, including electrodeposition method for DC-1.

Note: For purposes of this requirement, electrodeposition means a water-borne dip coating process in which opposite electrical charges are applied to the substrate and the coating. The coating is attracted to the substrate due to the electrochemical potential difference that is created;

- VIII. Any other coating application method capable of achieving a transfer efficiency equal to or better than that achieved by HVLV spraying, if the method is approved in writing by the IEPA.

- B. For the Emission Rate with Add-On Controls compliance option in 40 CFR 63 Subpart MMMM the following work practices apply. Pursuant to 40 CFR 63.3963(d), the Permittee must meet the requirements for bypass lines in 40 CFR 63.3968(b) for controlled coating operations for which the Permittee does not conduct liquid-liquid material balances. If any bypass line is opened and emissions are diverted to the atmosphere when the coating operation is running, this is a deviation that must be reported as specified in 40 CFR 63.3910(c)(6) and 40 CFR 63.3920(a)(7). For the purposes of completing the compliance calculations specified in 40 CFR 63.3961(h), the Permittee must treat the materials used during a deviation on a controlled coating operation as if they were used on an uncontrolled coating operation for the time period of the deviation as indicated in Equation 1 of 40 CFR 63.3961.

ii. Compliance Method (Work Practice Requirements)

Monitoring

- A. Pursuant to 39.5(7)(b) and (d) of the Act, the Permittee shall perform daily inspections to verify compliance with the work practice requirements in Conditon 4.1.2(i)(i)(A).

Recordkeeping

- B. Pursuant to 39.5(7)(b) and (e) of the Act, daily records of each inspection to verify compliance with the work practice requirements of 35 IAC 218.219(b)(1) through (6) and the findings of the inspection shall be kept.
- C. Pursuant to 40 CFR 63.3963(e), the Permittee must demonstrate continuous compliance with the work practice standards in 40 CFR 63.3893 by maintaining the records required by 40 CFR 63.3930(k)(8).

- D. Pursuant to 40 CFR 3930(k)(8), the Permittee shall keep a record of the work practice plan required by 40 CFR 63.3893 and documentation that the Permittee is implementing the plan on a continuous basis.

3. Non-Applicability Determinations

- a. The coating lines and curing ovens are not subject to 35 IAC 218.301 because 35 IAC 218.209 excludes these emission units from this requirement.
- b. The coating lines and curing ovens are not subject to 35 IAC 216.121 and 35 IAC 217.121, because these emission units are not by definition fuel combustion units.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
 - I. Requirements in Conditions 4.1.2(a)(i), 4.1.2(b)(i), 4.1.2(c)(i), 4.1.2(d)(i), 4.1.2(e)(i), 4.1.2(f)(i), 4.1.2(g)(i), 4.1.2(h)(i), and 4.1.2(i)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.

b. NESHAP Reporting Requirements

Pursuant to 40 CFR 63.3920(a), the Permittee must submit semiannual compliance reports for each affected coating operation according to the requirements below. The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in 40 CFR 63.3920(a)(2).

- I. Pursuant to 40 CFR 63.3920(a)(1), unless the Administrator has approved or agreed to a different schedule for submission of reports under 40 CFR 63.10(a), the Permittee must prepare and submit each semiannual compliance report according to the dates specified below. Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
 1. Pursuant to 40 CFR 63.3920(a)(1)(ii), each subsequent semiannual compliance report must cover the subsequent semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
 2. Pursuant to 40 CFR 63.3920(a)(1)(iii), each semiannual compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
 3. Pursuant to 40 CFR 63.3920(a)(1)(iv), for each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part

Meyer Steel Drum, Inc.
I.D. No.: 031600APY
Permit No.: 95120079

Date Received: 9-8-2009
Date Issued: TBD

71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), the Permittee may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the date specified in 40 CFR 63.3920(a)(1)(iii) above.

- II. Pursuant to 40 CFR 63.3920(a)(2), each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A). If an affected source submits a semiannual compliance report pursuant to this section along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A), and the semiannual compliance report includes all required information concerning deviations from any emission limitation in this subpart, its submission will be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a semiannual compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.
- III. Pursuant to 40 CFR 63.3920(a)(3), the semiannual compliance report must contain the information specified below:
1. Pursuant to 40 CFR 63.3920(a)(3)(i), the company name and address.
 2. Pursuant to 40 CFR 63.3920(a)(3)(ii), a statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
 3. Pursuant to 40 CFR 63.3920(a)(3)(iii), the date of the report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
 4. Pursuant to 40 CFR 63.3920(a)(3)(iv), identification of the compliance option or options as specified in 40 CFR 63.3891 that the Permittee used on each coating operation during the reporting period. If the Permittee switched between compliance options during the reporting period, the Permittee must report the beginning and ending dates for each option the Permittee used.
 5. Pursuant to 40 CFR 63.3920(a)(3)(v), if the Permittee used the emission rate without add-on controls or the emission rate with add-on controls compliance option (40 CFR 63.3891(b) or (c)), the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period.
- IV. Pursuant to 40 CFR 63.3920(a)(4), if there were no deviations from the emission limitations in 40 CFR 63.3890, 63.3892, and 63.3893 that apply to the Permittee, the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period. If the Permittee used the emission rate with add-on controls option and there were no periods during which the continuous parameter monitoring systems (CPMS) were out-of-control as specified in 40 CFR 63.8(c)(7), the semiannual compliance report must include a statement that there were no periods during which the CPMS were out-of-control during the reporting period.
- V. Pursuant to 40 CFR 63.3920(a)(5), if the Permittee used the compliant material option and there was a deviation from the applicable organic HAP content requirements in 40 CFR 63.3890, the semiannual compliance report must contain the

information below.

1. Pursuant to 40 CFR 63.3920(a)(5)(i), identification of each coating used that deviated from the applicable emission limit, and each thinner and/or other additive, and cleaning material used that contained organic HAP, and the dates and time periods each was used.
 2. Pursuant to 40 CFR 63.3920(a)(5)(ii), the calculation of the organic HAP content (using Equation 2 of 40 CFR 63.3941) for each coating identified in paragraph (a)(5)(i) of this section. The Permittee does not need to submit background data supporting this calculation (e.g., information provided by coating suppliers or manufacturers, or test reports).
 3. Pursuant to 40 CFR 63.3920(a)(5)(iii), the determination of mass fraction of organic HAP for each thinner and/or other additive, and cleaning material identified in paragraph (a)(5)(i) of this section. The Permittee does not need to submit background data supporting this calculation (e.g., information provided by material suppliers or manufacturers, or test reports).
 4. Pursuant to 40 CFR 63.3920(a)(5)(iv), a statement of the cause of each deviation.
- VI. Pursuant to 40 CFR 63.3920(a)(6), if the Permittee used the emission rate without add-on controls option and there was a deviation from the applicable emission limit in 40 CFR 63.3890, the semiannual compliance report must contain the information below.
1. Pursuant to 40 CFR 63.3920(a)(6)(i), the beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit in 40 CFR 63.3890.
 2. Pursuant to 40 CFR 63.3920(a)(6)(ii), the calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred. The Permittee must submit the calculations for Equations 1, 1A through 1C, 2, and 3 of 40 CFR 63.3951; and if applicable, the calculation used to determine mass of organic HAP in waste materials according to 40 CFR 63.3951(e)(4). The Permittee does not need to submit background data supporting these calculations (e.g., information provided by materials suppliers or manufacturers, or test reports).
 3. Pursuant to 40 CFR 63.3920(a)(6)(iii), a statement of the cause of each deviation.
- VII. Pursuant to 40 CFR 63.3942(c), as part of each semiannual compliance report required by 40 CFR 63.3920, the Permittee must identify the coating operation(s) for which the Permittee used the compliant material option. If there were no deviations from the applicable emission limit in 40 CFR 63.3890, the Permittee shall submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because the Permittee used no coatings for which the organic HAP content exceeded the applicable emission limit in 40 CFR 63.3890, and the Permittee used no thinner and/or other additive, or cleaning material that contained organic HAP, determined according to 40 CFR 63.3941(a).
- VIII. Pursuant to 40 CFR 63.3952(c), as part of each semiannual compliance report required by 40 CFR 63.3920, the Permittee must identify the coating operation(s) for which the Permittee used the emission rate without add-on controls option. If there were no deviations from the emission limitations, the Permittee must submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because the organic HAP emission rate for

each compliance period was less than or equal to the applicable emission limit in 40 CFR 63.3890, determined according to 40 CFR 63.3951(a) through (g).

- IX. Pursuant to 40 CFR 63.3963(f), As part of each semiannual compliance report required in 40 CFR 63.3920, the Permittee must identify the coating operation(s) for which the Permittee used the emission rate with add-on controls option. If there were no deviations from the emission limitations, the Permittee shall submit a statement that the source was in compliance with the emission limitations during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit in 40 CFR 63.3890, and the Permittee achieved the operating limits required by 40 CFR 63.3892 and the work practice standards required by 40 CFR 63.3893 during each compliance period.
- X. Pursuant to 40 CFR 63.3963(e), if the Permittee did not develop a work practice plan, or did not implement the plan, or did not keep the records required by 40 CFR 63.3930(k)(8), this is a deviation from the work practice standards that must be reported as specified in 40 CFR 63.3910(c)(6) and 40 CFR 63.3920(a)(7).

4.2 Drum Reclamation Furnace

1. Emission Units and Operations

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
Natural Gas-Fired Drum Cleaning Reclamation Furnace (DRF-1)	VOM, PM ₁₀ , PM	1991	N/A	Permanent Total Enclosure (Inlet Tunnel), Afterburner (AB-1) and Drum Quench (Tunnel Outlet)	Thermocouple with chart recorder
Ash Handling Conveyor	??	1991	N/A	??	None

2. Applicable Requirements

For the emission units in Condition 4.2.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7) (a), 39.5(7) (b), and 39.5(7) (d) of the Act.

a. i. Opacity Requirements

- A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122.

ii. Compliance Method (Opacity Requirements)

Monitoring

- A. Pursuant to Sections 39.5(7) (b) and (d) of the Act, at a minimum, the Permittee shall perform observations for visible emissions on the drum reclamation furnace in accordance with Method 22 at least weekly. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the drum reclamation furnace, maintenance and repair, and/or adjustment of fuel usage. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 9. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted shall be performed daily until the opacity drops below 5% at which time weekly Method 22 observations may be recommenced.

Recordkeeping

- B. Pursuant to Section 39.5(7) (b) and (e) of the Act, the Permittee shall keep records for each visible emissions observation performed. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.
- C. Pursuant to Section 39.5(7) (b) and (e) of the Act, the Permittee shall keep records for all Method 9 opacity measurements made in accordance with Condition 4.1.2(a) (ii) (A) above.

b. i. Particulate Matter Requirements (PM)

Meyer Steel Drum, Inc.
I.D. No.: 031600APY
Permit No.: 95120079

Date Received: 9-8-2009
Date Issued: TBD

A. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c).

B. Pursuant to Permit 91040073, emissions of PM_{10} from the drum reclamation furnace (process emissions) shall not exceed 6.6 lb/hr and 9.9 tons/year. [T1]

Note: The limits in Condition 4.2.2(b) (i) (B) were revised in the CAAPP permit issued on ??????.

ii. Compliance Method (PM Requirements)

Monitoring

A. Compliance with annual limits shall be determined based on the recordkeeping requirements and from a running total of 12 months of data.

B. Pursuant to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, the drum reclamation furnace is subject to 40 CFR Part 64. The Permittee shall comply with the monitoring requirements of the CAM Plan described in Condition 7.5 and Table 7.5.2, pursuant to 40 CFR Part 64 as submitted in the Permittee's CAM plan application. At all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment, pursuant to 40 CFR 64.7(a) and (b).

Testing

C. Pursuant to Section 39.5(7) (b) and (d) of the Act, the PM emissions from the drum reclamation furnace shall be determined according to Reference Method 1 through 4 and Reference Method 5 of 40 CFR 60 Appendix A within 9 months of the effective date of this permit and annually thereafter. The Permittee shall comply with all requirements in Section 7.1.

Recordkeeping

D. Pursuant to Section 39.5(7) (b) and (d) of the Act, the Permittee shall maintain records of the maximum hourly PM and annual emissions of PM_{10} from the drum reclamation furnace with supporting calculations (lb/hour, ton/month and ton/yr).

c. i. Volatile Organic Material Requirements (VOM)


A. Pursuant to Permit 91040073, emissions of VOM from the drum reclamation furnace (process emissions) shall not exceed 5.0 lbs/hr and 7.5 tons/year. [T1]

ii. Compliance Method (VOM Requirements)

Testing

A. Pursuant to Section 39.5(7) (b) and (d) of the Act, the VOM emissions from the drum reclamation furnace shall be determined according to Reference Method 25 or 25A of 40 CFR 60 Appendix A within 9 months of the effective date of this permit and every five years annually thereafter. The Permittee shall comply with all requirements in Section 7.1.


Monitoring

- B.  Compliance with annual limits shall be determined based on the recordkeeping requirements and from a running total of 12 months of data.
- C. Pursuant to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, the drum reclamation furnace is subject to 40 CFR Part 64. The Permittee shall comply with the monitoring requirements of the CAM Plan described in Condition 7.5 and Table 7.5.2, pursuant to 40 CFR Part 64 as submitted in the Permittee's CAM plan application. At all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment, pursuant to 40 CFR 64.7(a) and (b).

Recordkeeping

- D. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall maintain records of the following items for the drum reclamation furnace to demonstrate compliance with the applicable requirements:
- I. The afterburner combustion temperature during the time of operation;
 - II. Inspection and maintenance logs for the drum reclamation furnace with all necessary repairs being performed with dates of maintenance actions taken;
 - III. The VOM emissions in tons/month and tons/year from the drum reclamation furnace with supporting calculations.
 - IV. The afterburner temperature records for all periods of operation on the drum reclamation furnace.

d. i. **Operational and Production Requirements**

- A.  Pursuant to Permit 91040073, the Permittee shall comply with the following limits:
- I. The operation of the drum reclamation furnace shall not exceed 3,000 hours/year. [T1]
 - II. The total rate of drums being processed (drums fed) by the drum reclamation furnace shall not exceed 480 drums/hr and 1,440,000 drums/yr. [T1]
- B. Pursuant to Construction Permit 91040073, at all times, including periods of startup, shutdown, and malfunction, the Permittee shall to the extent practicable operate the afterburner, including the capture ductwork, in a manner consistent with good air pollution control practices for minimizing emissions. At minimum, these practices shall include the following:
- I. The secondary combustion chamber (afterburner) of the drum reclamation furnace shall be preheated to the manufacturer's recommended temperature but not lower than 1600°F prior to introducing drums into the furnace. [T1]
 - II. This secondary combustion chamber temperature shall be maintained at a minimum of 1600°F until burnout of residue from the drums in the primary chamber is completed. [T1]

III. The afterburner of the drum reclamation furnace shall be equipped with a continuous temperature indicator and strip chart recorder or disk storage. [T1]

- C. Pursuant to 39.5(7) (a) of the Act, the Permittee shall calibrate the continuous temperature monitor on at least a quarterly basis and maintain the monitor on at least a monthly basis.
- D. Pursuant to 39.5(7) (a) of the Act, the Permittee shall operate the afterburner at all times when the Drum Reclamation Furnace is in operation.

ii. Compliance Method (Operational and Production Requirements)

Monitoring

- A. Compliance with annual limits shall be determined based on the recordkeeping requirements and from a running total of 12 months of data.
- B. Pursuant to 39.5(7) (b) and (d), the Permittee shall conduct monthly inspections of the condition and integrity of the drum reclamation furnace, the permanent total enclosure and the associated afterburner and conduct any required maintenance or repairs as a result of such inspections.

Recordkeeping

- C. Pursuant to 39.5(7) (b) and (e) of the Act, the Permittee shall keep the following records:
 - I. Hours of operation of the drum reclamation furnace (hrs/month and hours/year)
 - II. Number of drums charged into the furnace (drums/hour and drums/year);
- D. Pursuant to Section 39.5(7) (b) and (e) of the Act, the Permittee shall maintain the following records:
 - E. Inspection and maintenance logs for the drum reclamation furnace and afterburner with all necessary repairs being performed with dates of maintenance actions taken.

e. i. Work Practice Requirements

- A. Pursuant to 39.5(7) (a) of the Act the following work practices shall be implemented:
 - I. No drums which were used to contain pesticides, fungicides, or insecticides shall be fed in the drum reclamation furnace.
 - II. No drums with more than 1" of residue in them shall be charged to the Drum Reclamation Furnace until such residue has been removed.
- B. Pursuant to Permit 02120008, the Permittee shall operate the drum reclamation furnace inside the permanent total enclosure (PTE) and maintain the PTE in a manner consistent with good air pollution control practices for minimizing emissions.

ii. Compliance Method (Work Practice Requirements)

Testing

- A. Pursuant to Section 39.5(7)(b) and (d) of the Act, the Permittee shall perform a test within 9 months of the effective date of this permit and at least every 5 years that is designed to measure the capture efficiency of the Permanent Total Enclosure (PTE) using Reference Method 204 as incorporated into 35 IAC Part 218. The Permittee shall comply with all requirements in Section 7.1.
- B. Pursuant to Section 39.5(7)(b) and (d) of the Act, the Permittee must retest the PTE in accordance with Condition 4.2.2(e)(ii)(A) above any time the enclosure is modified or a change in practice would impact the NDO's of the PTE. The test shall be done within 3 months of the modification or change.

Monitoring

- A. Sufficient periodic monitoring is established in Condition 4.2.2(d)(ii)(B) and 4.2.2(e)(ii)(B).

Recordkeeping

- D. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall maintain the following records:
 - I. Inspection and maintenance logs for the drum reclamation furnace and afterburner with all necessary repairs being performed with dates of maintenance actions taken; and
 - II. Inspection and maintenance logs for the permanent total enclosure with all necessary repairs being performed with dates of maintenance actions taken.

f. i. Nitrogen Oxide Emissions Requirements (NOx)

- A. Pursuant to Permit 91040073, emissions of NOx from the drum reclamation furnace (process emissions) shall not exceed 1.43 lbs/hr and 2.1 tons/year. [T1]

ii. Compliance Method (NOx Requirements)

Testing

- A. Pursuant to Section 39.5(7)(b) and (d) of the Act, the NOx emissions from the drum reclamation furnace shall be determined according to Reference Method 17 of 40 CFR 60 Appendix A within 9 months of the effective date of this permit. The Permittee shall comply with all requirements in Section 7.1.

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall maintain records of the following items for the drum reclamation furnace to demonstrate compliance with the applicable requirements:
 - I. The NOx emissions in tons/month and tons/year from the drum reclamation furnace with supporting calculations.

3. Non-Applicability Determinations

- a. The drum reclamation furnace is not subject to 35 IAC 216.121 and 217.121, because the drum reclamation furnace is not by definition a fuel combustion emission unit.
- b. The drum reclamation furnace is not subject to 40 CFR Part 62 Subpart III "Federal Plan Requirements for commercial and Industrial Solid Waste Incineration Units that Commenced Construction on or before November 30, 1999" because of the exemption status for drum reclamation units established in 40 CFR 62.14525(k).
- c. The drum reclamation furnace is not subject to 35 IAC 218.301 because it is not a process that uses organic material.
- d. The drum reclamation furnace is not subject to 40 CFR 63 Subpart DDDDD: NESHP for Industrial, Commercial, and Institutional Boilers and Process Heaters because the drum reclamation furnace is not by definition a boiler or process heater.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHP requirement:
 - I. Requirements in Conditions 4.2.2(a)(i), 4.2.2(b)(i), 4.2.2(c)(i), 4.2.2(d)(i), and 4.2.2(e)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.

4.3 Shot Blasters

1. Emission Units and Operations

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
Shot Blaster SB-1	PM	1991	N/A	Filter (FF-1)	Magnehelic differential pressure gauge
Shot Blaster SB-2	PM	1991	N/A	Filter (FF-2)	Magnehelic differential pressure gauge
Shot Blaster SB-3	PM	1991	N/A	Filter (FF-3)	Magnehelic differential pressure gauge
Shot Blaster SB-4	PM	1993	N/A	Filter (FF-4)	Magnehelic differential pressure gauge
Shot Blaster SB-5	PM	2011	N/A	Filter (FF-2)	Magnehelic differential pressure gauge

2. Applicable Requirements

For the emission units in Condition 4.3.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7) (a), 39.5(7) (b), and 39.5(7) (d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7) (b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity in accordance with Method 22 for visible emissions at least once every calendar month. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the affected shot blaster and/or maintenance and repair. If corrective action was taken the Permittee shall perform a follow-up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within 7 days in accordance with Condition 2.4.

Recordkeeping

B. Pursuant to Section 39.5(7) (b) and (e) of the Act, the Permittee shall keep records for each observation for opacity conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

- C. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9.

b. i. **Particulate Matter Requirements (PM)**

- A. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, to exceed the allowable emission rates specified in subsection (c) of 35 IAC 212.321(See Condition 7.2).



Pursuant to Permit 90060034, emissions of PM from the shotblasters (SB-1 through 4) shall not exceed 0.1 lbs/hr and 0.44 tpy. [T1]

ii. **Compliance Method (PM Requirements)**

Testing

- A. Pursuant to Section 39.5(7)(b) and (d) of the Act, the PM emissions from the shot blasters shall be determined according to Reference Method 1 through 4 and Reference Method 5 of 40 CFR 60 Appendix A within 9 months of the effective date of this permit and every five years thereafter.

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall maintain records of the maximum hourly PM emissions from the shotblasters with supporting calculations (lb/hour).

c. i. **Work Practice Requirements**



Monitoring

- A. Pursuant to Section 39.5(7)(b) and (d) of the Act, the Permittee shall perform quarterly inspections of the shotblaster equipment and fabric filters.

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep records of each quarterly inspection performed on the shotblaster equipment and filters along with a maintenance and repair log. These records shall include, at a minimum; date and time inspections were performed, name(s) of inspection personnel, identification of equipment being inspected, findings of the inspections, operation and maintenance procedures, and description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment.

3. Non-Applicability Determinations

- a. The shot blasters are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because each shot blaster does not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

4. Other Requirements

Section 4 - Emission Unit Requirements
4.3 - Shot Blasters

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

Meyer Steel Drum, Inc.
I.D. No.: 031600APY
Permit No.: 95120079

Date Received: 9-8-2009
Date Issued: TBD

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
 - I. Requirements in Conditions 4.3.2(a)(i), 4.3.2(b)(i), and 4.3.2(c)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.

4.4 Fuel Combustion Equipment

1. Emission Units and Operations

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
Natural Gas Fired Boiler (B-1) 12 mmBtu/hr	NO _x , CO	1991	N/A	None	None
Waste Heat Boiler on the DRF-1 Unit (8 mmBTU/hr)	PM, CO and NO _x	1982	N/A	None	None

2. Applicable Requirements

b. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for visible emissions in accordance with Method 22 at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the affected boiler and/or maintenance and repair. If corrective action was taken the Permittee shall perform a follow-up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within 7 days in accordance with Condition 2.4.

Recordkeeping Requirements

B. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep records for each observation for visible emissions conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9.

b. i. Nitrogen Oxide Requirements (NO_x)

A. Pursuant to CAAPP Permit 95120079, NO_x emissions from boiler B-1 shall not exceed 0.43 ton/month and 2.34 ton/year. [T1]

B. Pursuant to Permit 82040058, NO_x emissions from the Waste Heat Boiler shall not exceed 3.06 tons/year. [T1]

ii. Compliance Method (NO_x Requirements)

Meyer Steel Drum, Inc.
I.D. No.: 031600APY
Permit No.: 95120079

Date Received: 9-8-2009
Date Issued: TBD

Monitoring

- A. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- B. Sufficient periodic monitoring is established in Condition 4.4.2(d)(ii) and (e)(i)(A).

Recordkeeping Requirements

- C. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall maintain records of the monthly and annual emissions of NO_x from the boilers with supporting calculations (tons/month and tons/year).

c. i. **Carbon Monoxide Requirements (CO)**

- A. Pursuant to 35 IAC 216.121, no person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmbtu/hr) to exceed 200 ppm, corrected to 50 percent excess air.
- B. Pursuant to Permit 82040058, CO emissions from the Waste Heat Boiler shall not exceed 0.30 tons/year. [T1]
- C. Pursuant to Permit 95030018, CO emissions from boiler B-1 shall not exceed 3.06 tons/year. [T1]

ii. **Compliance Method (CO Requirements)**

Recordkeeping Requirements

- A. Sufficient periodic monitoring is established in Condition 4.4.2(d)(ii) and (e)(i)(A).
- B. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall maintain records of the monthly and annual emissions of CO from the boilers with supporting calculations (tons/month and tons/year).

d. i. **Operational and Production Requirements**

- A. Pursuant to Section 39.5(7)(a) of the Act, pipeline quality natural gas shall be the only fuel fired in the boiler.
- B. Pursuant to Permit 95030018, hours of operation for boiler B-1 shall not exceed 3900 hours/year. [T1]
- C. Pursuant to Permit 95030018, the maximum firing rate for boiler B-1 shall not exceed 12mmBTU/hr. [T1]

ii. **Compliance Method (Operational and Production Requirements)**

Recordkeeping Requirements

- A. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall maintain records of the type of fuel fired in the boiler.
- B. Pursuant to 40 CFR 60.48c(g)(2), the owner or operator of the boiler shall record and maintain records of the amount of each fuel combusted during each calendar month.

C. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall maintain records of the hours of operation for boiler B-1.

D. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall maintain records of the actual heat input in mmBTU/hr for boiler B-1.

e. i. **Work Practice Requirements**

A. Pursuant to 40 CFR 63.7540(a)(10) and after January 31, 2016, the Permittee shall comply with the following tune-up requirements for each boiler and conduct such tune-ups annually, unless the boiler is equipped with an oxygen trim system that maintains an optimum air to fuel ratio:

- I. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the Permittee may delay the burner inspection until the next scheduled unit shutdown).
- II. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.
- III. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the Permittee may delay the inspection until the next scheduled unit shutdown).
- IV. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NOx requirement to which the boiler is subject.
- V. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.

ii. Compliance Method (Work Practice Requirements)

Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform monthly inspections of the boiler.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep records of each inspection performed along with a maintenance and repair log. These records shall include, at a minimum: date and time inspections were performed, name(s) of inspection personnel, identification of equipment being inspected, findings of the inspections, operation and maintenance procedures, and a description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment.

C. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep records of each tune-up performed in accordance with the requirements of 40 CFR 63.7540(a)(10). These records shall include, at a minimum: date and time the tune-up was performed, name(s) of the personnel performing the tune-up, identification of the boiler, work performed in doing the tune-up, and the measured CO concentrations before and after the work was performed.

- f. i. Particulate Matter Requirements (PM)
- A. Pursuant to Permit 82040058, PM emissions from the Waste Heat Boiler shall not exceed 0.17 tons/year. [T1]
- ii. Compliance Method (PM Requirements)
- Recordkeeping Requirements
- A. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall maintain records of the monthly and annual emissions of CO from the boilers with supporting calculations (tons/month and tons/year).

3. Non-Applicability Determinations

- a. The boilers are not subject to the National Emission Standards for Hazardous Air Pollution (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR Part 63 Subpart JJJJJJ, because the boilers are gas-fired pursuant to 40 CFR 63.11195(e).
- b. The boilers are not subject to 35 IAC 212.206 and 35 IAC 214.161 because the boilers use natural gas exclusively.
- c. The boilers are not subject to 35 IAC 218.301 and 35 IAC 218.302 because pursuant to 35 IAC 218.303, these requirements do not apply to fuel combustion emission sources.
- d. The boilers are not subject to 35 IAC 217.141 because the heat input of the boilers are less than 250 mmBtu/hr.
- e. The boilers are not subject to 35 IAC 217 Subparts D, E, F, G, H, I, and M, because the boilers do not have the potential to emit 100 tons/year of NO_x.
- f. The boilers are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources for all pollutants, because the boilers do not use an add-on control device to achieve compliance with an emission limitation or standard.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Illinois Environmental Protection Act.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the Illinois EPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows:
- I. Requirements in Conditions 4.4.2(a)(i), 4.4.2(b)(i), 4.4.2(c)(i), 4.4.2(d)(i), 4.4.2(e)(i), and 4.4.2(f)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the Illinois EPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Reports required by Condition 3.5(b).

Meyer Steel Drum, Inc.
I.D. No.: 031600APY
Permit No.: 95120079

Date Received: 9-8-2009
Date Issued: TBD

iii. The deviation reports shall contain at a minimum the following information:

- A. Date and time of the deviation.
- B. Emission unit(s) and/or operation involved.
- C. The duration of the event.
- D. Probable cause of the deviation.
- E. Corrective actions or preventative measures taken.

4.5 Storage Tank

1. Emission Units and Operations

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
(2) - 5,000 gallon underground gasoline storage tank	VOM	1995	N/A	Submerged Fill Pipe	None

2. Applicable Requirements

For the emission units in Condition 4.5.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Work Practice Requirements

- A. Pursuant to 35 IAC 218.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 250 gal, unless such tank is equipped with a permanent submerged loading pipe or submerged fill.
- B. Pursuant to 35 IAC 218.583(a), the transfer of gasoline from any delivery vessel into the stationary storage tank at a gasoline dispensing operations shall include the following:
 - I. The tank is equipped with a submerged loading pipe.
 - II. The vapors displaced from the storage tank during filling and processed by a vapor control system that includes one or more of the following:
 - 1. A vapor collection system that meets the requirements of 35 IAC 218.583(d)(4); and
 - 2. The delivery vessel displays the appropriate sticker pursuant to the requirements of 35 IAC 218.584(b) or (d).
 - III. All tank vent pipes are equipped with pressure/vacuum relief valves and shall be set to resist a pressure of at least 3.5 inches water column and to resist a vacuum of no less than 6.0 inches water column.
- C. Pursuant to 35 IAC 218.583(c), the Permittee shall:
 - I. Operate all control systems and make all process modifications required by 35 IAC 218.583(a);
 - II. Provide instructions to the operator of the gasoline dispensing operation describing necessary maintenance operations and procedures for prompt notification of the owner in case of any malfunction of a vapor control system; and
 - III. Repair, replace or modify any worn out or malfunctioning component or element of design.
- D. Pursuant to 35 IAC 218.583(d), the operator of a gasoline dispensing operation shall fulfill the following:

- I. Maintain and operate each vapor control system in accordance with the owner's instructions;
 - II. Promptly notify the owner of any scheduled maintenance or malfunction requiring replacement or repair of a major component of a vapor control system;
 - III. Maintain gauges, meters or other specified testing devices in proper working order;
 - IV. Operate the vapor collection system and delivery vessel unloading points in a manner that prevents:
 - 1. A reading equal to or greater than 100 percent of the lower explosive limit (LEL measured as propane) when tested in accordance with the procedure described in EPA 450/2-78-051 Appendix B incorporated by reference in 35 IAC 218.112; and
 - 2. Avoidable leaks of liquid during the filling of storage tanks;
 - V. Within 15 business days after discovery of the leak by the owner, operator, or the Illinois EPA, repair and retest a vapor collection system which exceeds the limits of 35 IAC 218.583(d) (4) (A) (Condition 4.2(2) (a) (i) (C) (IV) above).
- E. Pursuant to Permit 95030018, the emissions of VOM from the storage tanks shall not exceed 0.1 tpy. [T1]



ii. Compliance Method (Work Practice Requirements)

Monitoring

- A. I. Pursuant to 35 IAC 218.583(a) (4), the Permittee shall demonstrate compliance with 35 IAC 218.583(a) (3) after installation of each pressure/vacuum relief valve, and at least annually thereafter, by measuring and recording the pressure indicated by a pressure/vacuum gauge at each tank vent pipe. The test shall be performed on each tank vent pipe within two hours after product delivery into the respective storage tank. For manifold tank vent systems, observations at any point within the system shall be adequate.
- II. Pursuant to Section 39.5(7) (a) of the Act, the Permittee shall conduct semi-annual inspections of the gasoline storage tank and dispensing operation while the tank is being filled by inspecting at least the following:
 - 1. Retractors, hoses, breakaways, swivels.
 - 2. Adapters, vapor caps, rubber gaskets, and spill containment buckets
 - 3. Gauges and meters.
 - 4. Submerged loading pipe is physically present and the condition of the pipe for integrity.

Recordkeeping

- B. Pursuant to Section 39.5(7) (b) and (e) of the Act, the Permittee shall maintain records of the presence of the submerged loading pipes or submerged fill, vapor control system, and pressure/vacuum relief valves.

- C. I. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall maintain the records of conducted inspections, with a date and results of such inspections.
- II. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep a copy of operating instructions and maintenance log.

b. i. **Operational and Production Requirements**

- A. Pursuant to Section 39.5(7)(a) of the Act, the average monthly gasoline throughput shall not exceed 10,000 gallons.

ii. **Compliance Method (Operational and Production Requirements)**

Recordkeeping

- A. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep monthly and annual records of gasoline throughput.

3. Non-Applicability Determinations

- a. The storage tanks are not subject to the New Source Performance Standards (NSPS) for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) , 40 CFR Part 60, Subpart Kb, because the capacity of the storage tanks are less than 75 cubic meters (18,813 gallons) pursuant to 40 CFR 60.110b(a).
- b. The storage tanks are not subject to 35 IAC 218.121, because each storage tank has a capacity less than 40,000 gallons.
- c. The storage tanks are not subject to 35 IAC 218.122(a), because the storage tanks have a capacity of less than 40,000 gallons.
- d. The storage tanks are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the storage tanks are not subject to an emission limitation or standard for the applicable regulated air pollutant.
- e. The storage tanks are not subject to 35 IAC 35 IAC 218.301 because they are not a process using organic material.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. **Prompt Reporting**

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
 - I. Requirements in Conditions 4.5.2(a)(i) and 4.5.2(b)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

Meyer Steel Drum, Inc.
I.D. No.: 031600APY
Permit No.: 95120079

Date Received: 9-8-2009
Date Issued: TBD

- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Reports required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.

Section 5 - Additional Title I Requirements

This Section is reserved for Title I requirements not specified in Sections 3 or 4. As of the date of issuance of this permit, there are no Title I requirements that need to be separately addressed in this Section.

Section 6 - Insignificant Activities Requirements

1. Insignificant Activities Subject to Specific Regulations

Pursuant to 35 IAC 201.146, this condition is reserved for insignificant activities obligated to comply with Sections 9.1(d) and Section 39.5 of the Act; Sections 165, 173, and 502 of the Clean Air Act; or any other applicable permit or registration requirements. As of the date of issuance of this permit, there are no such insignificant activities present at the source.

2. Insignificant Activities in 35 IAC 201.210(a)

In addition to any Insignificant Activities identified in Condition 6.1, the following additional activities at the source constitute insignificant activities:

<i>Insignificant Activity</i>	<i>Number of Units</i>	<i>Insignificant Activity Category</i>
Oil Storage Tanks (Tanks #2, #7, and #8)	3	35 IAC 201.210(a) (1) and 201.211
Wash/Dip Tank (W-2)	1	35 IAC 201.210(a) (1) and 201.211
Drum Preheater	1	35 IAC 201.210(a) (1) and 201.211
Drum Interior Washers	6	35 IAC 201.210(a) (1) and 201.211
Drum Preheater	1	35 IAC 201.210(a) (1) and 201.211
Drum Exterior Washer	1	35 IAC 201.210(a) (1) and 201.211
Rinse Tanks (T5, T3)	2	35 IAC 201.210(a) (1) and 201.211
Cleaning Tank (T4)	1	35 IAC 201.210(a) (1) and 201.211
Rust Inhibitor Tank	1	35 IAC 201.210(a) (1) and 201.211
Food Drum Washer	1	35 IAC 201.210(a) (2) or (a) (3)
Flame Treat Unit	1	35 IAC 201.210(a) (2) or (a) (3)
Dent Removers	2	35 IAC 201.210(a) (2) or (a) (3)
Chime Straighteners	2	35 IAC 201.210(a) (2) or (a) (3)
Lid Straightener	1	35 IAC 201.210(a) (2) or (a) (3)
Testing Area	1	35 IAC 201.210(a) (2) or (a) (3)
Horizontal and Vertical Drum Coolers	2	35 IAC 201.210(a) (2) or (a) (3)
Vacuum Emptying	1	35 IAC 201.210(a) (2) or (a) (3)
Process Tanks for Caustic Detergent Recycling	7	35 IAC 201.210(a) (2) or (a) (3)
Tight Head Assembly Equipment	1	35 IAC 201.210(a) (2) or (a) (3)
Leak Testers	2	35 IAC 201.210(a) (2) or (a) (3)
Vacuum System	1	35 IAC 201.210(a) (2) or (a) (3)
Purge Unit	1	35 IAC 201.210(a) (2) or (a) (3)
Semi Auto Leak Tester	1	35 IAC 201.210(a) (2) or (a) (3)
Scrubber for odor control (SC-1)	1	35 IAC 201.210(a) (2) or (a) (3)
Direct combustion units used for comfort heating and fuel combustion emission units as further detailed in 35 IAC 201.210(a) (4).	4	35 IAC 201.210(a) (4)
Storage tanks of virgin or rerefined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oil.	1	35 IAC 201.210(a) (11)

3. Insignificant Activities in 35 IAC 201.210(b)

Pursuant to 35 IAC 201.210, the source has identified insignificant activities as listed in 35 IAC 201.210(b) (1) through (28) as being present at the source. The source is not required to individually list the activities.

4. Applicable Requirements

Insignificant activities in Conditions 6.1 and 6.2 are subject to the following general regulatory limits notwithstanding status as insignificant activities. The Permittee shall comply with the following requirements, as applicable:

- a. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122, except as provided in 35 IAC 212.123(b).
- b. Pursuant to 35 IAC 212.321 or 212.322 (see Conditions 7.2(a) and (b)), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceed the allowable emission rates specified 35 IAC 212.321 or 212.322 and 35 IAC Part 266.
- c. Pursuant to 35 IAC 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2,000 ppm, except as provided in 35 IAC Part 214.
- d. Pursuant to 35 IAC 218.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 250 gal, unless such tank is equipped with a permanent submerged loading pipe, submerged fill, or an equivalent device approved by the IEPA according to 35 IAC Part 201 or unless such tank is a pressure tank as described in 35 IAC 215.121(a) or is fitted with a recovery system as described in 35 IAC 215.121(b) (2). Exception as provided in 35 IAC 218.122(c): If no odor nuisance exists the limitations of 35 IAC 215.122 shall only apply to the loading of volatile organic liquid with a vapor pressure of 2.5 psia or greater at 70°F.

5. Compliance Method

Pursuant to Section 39.5(7)(b) of the Act, the source shall maintain records of the following items for the insignificant activities in Conditions 6.1 and 6.2:

- a. List of all insignificant activities, including insignificant activities added as specified in Condition 6.6, the categories the insignificant activities fall under, and supporting calculations as needed.
- b. Potential to emit emission calculations before any air pollution control device for each insignificant activity.

6. Notification Requirements for Insignificant Activities

The source shall notify the IEPA accordingly to the addition of insignificant activities:

a. Notification 7 Days in Advance

- i. Pursuant to 35 IAC 201.212(b), 35 IAC 201.146(kkk), and Sections 39.5(12)(a) and (b) of the Act; for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a) (1) and 201.211 and is not currently identified in Conditions 6.1 or 6.2, a notification to the IEPA Permit Section 7 days in advance of the addition of the insignificant activity is required. Addresses are

Meyer Steel Drum, Inc.
I.D. No.: 031600APY
Permit No.: 95120079

Date Received: 9-8-2009
Date Issued: TBD

included in Attachment 3. The notification shall include the following pursuant to 35 IAC 201.211(b):

- A. A description of the emission unit including the function and expected operating schedule of the unit.
 - B. A description of any air pollution control equipment or control measures associated with the emission unit.
 - C. The emissions of regulated air pollutants in lb/hr and ton/yr.
 - D. The means by which emissions were determined or estimated.
 - E. The estimated number of such emission units at the source.
 - F. Other information upon which the applicant relies to support treatment of such emission unit as an insignificant activity.
- ii. Pursuant to 35 IAC 201.212(b), 35 IAC 201.146(kkk), and Sections 39.5(12)(a) and (b) of the Act; for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(2) through 201.210(a)(18) and is not currently identified in Conditions 6.1 or 6.2, a notification to the IEPA Permit Section 7 days in advance of the addition of the insignificant activity is required. Addresses are included in Attachment 3.
 - iii. Pursuant to Sections 39.5(12)(a)(i)(b) and 39.5(12)(b)(iii) of the Act, the permit shield described in Section 39.5(7)(j) of the Act (see Condition 2.7) shall not apply to any change made in Condition 6.6(a) above.

b. Notification Required at Renewal

Pursuant to 35 IAC 201.212(a) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a) and is currently identified in Conditions 6.1 or 6.2, a notification is not required until the renewal of this permit.

c. Notification Not Required

Pursuant to 35 IAC 201.212(c) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(b) as describe in Condition 6.3, a notification is not required.

Section 7 - Other Requirements

1. Testing

- a. Pursuant to Section 39.5(7) (a) of the Act, a written test protocol shall be submitted at least sixty (60) days prior to the actual date of testing, unless it is required otherwise in applicable state or federal statutes. The IEPA may at the discretion of the Compliance Section Manager (or designee) accept protocol less than 60 days prior to testing provided it does not interfere with the IEPA's ability to review and comment on the protocol and does not deviate from the applicable state or federal statutes. The protocol shall be submitted to the IEPA, Compliance Section and IEPA, Stack Test Specialist for its review. Addresses are included in Attachment 3. This protocol shall describe the specific procedures for testing, including as a minimum:
 - i. The name and identification of the emission unit(s) being tested.
 - ii. Purpose of the test, i.e., permit condition requirement, IEPA or USEPA requesting test.
 - iii. The person(s) who will be performing sampling and analysis and their experience with similar tests.
 - iv. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the emission unit and any control equipment will be determined.
 - v. The specific determinations of emissions and operation which are intended to be made, including sampling and monitoring locations.
 - vi. The test method(s) that will be used, with the specific analysis method, if the method can be used with different analysis methods. Include if emission tests averaging of 35 IAC 283 will be used.
 - vii. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.
 - viii. Any proposed use of an alternative test method, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.
 - ix. Sampling of materials, QA/QC procedures, inspections, etc.
- b. The IEPA, Compliance Section shall be notified prior to these tests to enable the IEPA to observe these tests pursuant to Section 39.7(a) of the Act as follows:
 - i. Notification of the expected date of testing shall be submitted in writing a minimum of thirty (30) days prior to the expected test date, unless it is required otherwise in applicable state or federal statutes.
 - ii. Notification of the actual date and expected time of testing shall be submitted in writing a minimum of five (5) working days prior to the actual date of the test. The IEPA may at its discretion of the Compliance Section Manager (or designee) accept notifications with shorter advance notice provided such notifications will not interfere with the IEPA's ability to observe testing.
- c. Copies of the Final Report(s) for these tests shall be submitted to the IEPA, Compliance Section within fourteen (14) days after the test results are compiled and finalized but

no later than ninety (90) days after completion of the test, unless it is required otherwise in applicable state or federal statutes or the IEPA may at the discretion of the Compliance Section Manager (or designee) an alternative date is agreed upon in advance pursuant to Section 39.7(a) of the Act. The Final Report shall include as a minimum:

- i. General information including emission unit(s) tested.
 - ii. A summary of results.
 - iii. Discussion of conditions during each test run (malfunction/breakdown, startup/shutdown, abnormal processing, etc.).
 - iv. Description of test method(s), including description of sampling points, sampling train, analysis equipment, and test schedule.
 - v. Detailed description of test conditions, including:
 - A. Process information, i.e., mode(s) of operation, process rate, e.g. fuel or raw material consumption.
 - B. Control equipment information, i.e., equipment condition and operating parameters during testing.
 - C. A discussion of any preparatory actions taken, i.e., inspections, maintenance and repair.
 - vi. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.
 - vii. An explanation of any discrepancies among individual tests or anomalous data.
 - viii. Results of the sampling of materials, QA/QC procedures, inspections, etc.
 - ix. Discussion of whether protocol was followed and description of any changes to the protocol if any occurred.
 - x. Demonstration of compliance showing whether test results are in compliance with applicable state or federal statutes.
- d. Copies of all test reports and other test related documentation shall be kept on site as required by Condition 2.5(b) pursuant to Section 39.5(7)(e)(ii) of the Act.

2. PM Process Weight Rate Requirements

a. New Process Emission Units - 35 IAC 212.321

New Process Emission Units For Which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321].

- i. No person shall cause or allow the emission of PM into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of PM from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c). See Condition 7.2(a) (iii) below. [35 IAC 212.321(a)]
- ii. Interpolated and extrapolated values of the data in 35 IAC 212.321(c) shall be determined by using the equation [35 IAC 212.321(b)]:

$$E = A(P)^B$$

Where:

P = Process weight rate (T/hr)
E = Allowable emission rate (lbs/hr)

A. Process weight rates of less than 450 T/hr:

A = 2.54
B = 0.53

B. Process weight rates greater than or equal to 450 T/hr:

A = 24.8
B = 0.16

iii. Limits for New Process Emission Units [35 IAC 212.321(c)]:

<u>P</u> <u>(T/hr)</u>	<u>E</u> <u>(lbs/hr)</u>	<u>P</u> <u>(T/hr)</u>	<u>E</u> <u>(lbs/hr)</u>
0.05	0.55	25.00	14.00
0.10	0.77	30.00	15.60
0.20	1.10	35.00	17.00
0.30	1.35	40.00	18.20
0.40	1.58	45.00	19.20
0.50	1.75	50.00	20.50
0.75	2.40	100.00	29.50
1.00	2.60	150.00	37.00
2.00	3.70	200.00	43.00
3.00	4.60	250.00	48.50
4.00	5.35	300.00	53.00
5.00	6.00	350.00	58.00
10.00	8.70	400.00	62.00
15.00	10.80	450.00	66.00
20.00	12.50	500.00	67.00

3. Emissions Reduction Market System (ERMS) Requirements

- a. Pursuant to 35 IAC Part 205, this source is considered a "participating source" for purposes of the ERMS.
- b. Obligation to Hold Allotment Trading Units (ATUs)
 - i. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 7.3(g), as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 - September 30), not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 7.3(d):
 - A. VOM emissions from insignificant emission units and activities as identified in Section 6 of this permit, in accordance with 35 IAC 205.220.
 - B. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit as authorized in Section 4 of this permit, in accordance with 35 IAC 205.225.
 - C. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3).
 - D. Excess VOM emissions that are a consequence of an emergency as approved by the IEPA, pursuant to 35 IAC 205.750.
 - E. VOM emissions from certain new and modified emission units as addressed by Condition 7.3(g)(ii), if applicable, in accordance with 35 IAC 205.320(f).
 - ii. In accordance with 35 IAC 205.150(c)(2), notwithstanding the Condition 7.3(b)(i) above, if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its seasonal VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 4 of this permit.
- c. Market Transactions
 - i. As specified in 35 IAC 205.610(a), the source shall apply to the IEPA for and obtain authorization for a Transaction Account prior to conducting any market transactions.
 - ii. Pursuant to 35 IAC 205.610(b), the Permittee shall promptly submit to the IEPA any revisions to the information submitted for its Transaction Account.
 - iii. Pursuant to 35 IAC 205.620(a), the source shall have at least one account officer designated for its Transaction Account.
 - iv. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the IEPA, in accordance with 35 IAC 205.620, and the transfer must be submitted to the IEPA for entry into the Transaction Account database.
- d. Emissions Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 7.3(b), it shall provide emissions excursion compensation in accordance with the following:

Meyer Steel Drum, Inc.
I.D. No.: 031600APY
Permit No.: 95120079

Date Received: 9-8-2009
Date Issued: TBD

- i. Upon receipt of an Excursion Compensation Notice issued by the IEPA, the source shall purchase ATUs from the ACMA in the amount specified by the notice, as follows:
 - A. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
 - B. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emissions excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- ii. If requested in accordance with paragraph 7.3(d)(iii) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the IEPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.
- iii. Pursuant to 35 IAC 205.720(c), within 15 days after receipt of an Excursion Compensation Notice, the Owner or Operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the IEPA, rather than purchased from the ACMA.

e. Quantification of Seasonal VOM Emissions

- i. Pursuant to 35 IAC 205.315(b), the methods and procedures specified in Sections 3 and 4 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions:

No exceptions
- ii. In accordance with 35 IAC 205.750, the Permittee shall report emergency conditions at the source to the IEPA if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.750(a), and shall be submitted in accordance with the following:
 - A. An initial emergency conditions report within two days after the time when such excess emissions occurred due to the emergency.
 - B. A final emergency conditions report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

f. Annual Account Reporting

- i. Pursuant to 35 IAC 205.300, for each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emissions Report, seasonal VOM emissions information to the IEPA for the seasonal allotment period. This report shall include the following information:
 - A. Actual seasonal emissions of VOM from the source.
 - B. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations.
 - C. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 IAC 205.337.

- D. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the IEPA.
 - E. If a source's baseline emissions have been adjusted due to a Variance, Consent Order, or CAAPP permit Compliance Schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3).
 - F. If a source is operating a new or modified emission unit for which three years of operational data is not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.
- ii. This report shall be submitted by October 31 of each year, for the preceding seasonal allotment period.

g. Allotment of ATUs to the Source

- i.
 - A. The allotment of ATUs to this source is 307 ATUs per seasonal allotment period.
 - B. This allotment of ATUs reflects the IEPA's determination that the source's baseline emissions were 34.845 tons per season.
 - C. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 7.3(i) of this permit.
 - D. ATUs will be issued to the source's Transaction Account by the IEPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.
- ii. Contingent Allotments for New or Modified Emission Units
None
- iii. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:
 - A. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630.
 - B. Deduction of ATUs as a consequence of emissions excursion compensation, in accordance with 35 IAC 205.720.
 - C. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

h. Recordkeeping for ERMS

Pursuant to 35 IAC 205.700(a), the Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of the ERMS:

- i. Seasonal component of the Annual Emissions Report.

- ii. Information on actual VOM emissions, as specified in detail in Sections 3 and 4 of this permit and Condition 7.3(e) (i).
- iii. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

i. Exclusions from Further Reductions

- i. A. Pursuant to 35 IAC 205.405(a), VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following:
 - I. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA.
 - II. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units, and internal combustion engines.
 - III. An emission unit for which a LAER demonstration has been approved by the IEPA on or after November 15, 1990.
- B. Pursuant to 35 IAC 205.405(a) and (c), the source has demonstrated in its ERMS application and the IEPA has determined that the following emission units qualify for exclusion from further reductions because they meet the criteria as indicated above:

Natural Gas-fired boilers and ovens

- ii. A. Pursuant to 35 IAC 205.405(b), VOM emissions from emission units using BAT for controlling VOM emissions shall not be subject to the VOM emissions reductions requirement specified in 35 IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT.
- B. Pursuant to 35 IAC 205.405(b) and (c), the source has demonstrated in its ERMS application and the IEPA has determined that the following emission units qualify for exclusion from further reductions because these emission units use BAT for controlling VOM emissions as indicated above:

None

4. 40 CFR 63 Subpart A Requirements (NESHAP)

a. 40 CFR 63 Subpart A and Subpart MMM - NESHAP for Surface Coating of Miscellaneous Metal Parts and Products

Pursuant to 40 CFR 63 Subpart A and Subpart MMM, the Permittee shall comply with the following applicable General Provisions as indicated:

<i>General Provision Citation</i>	<i>General Provision Applicable?</i>	<i>Subject of Citation</i>	<i>Explanation (if required)</i>
40 CFR 63.1	Yes	General Applicability of the General Provisions	
40 CFR 63.2	Yes	Definitions	
40 CFR 63.3	Yes	Units and Abbreviations	
40 CFR 63.4	Yes	Prohibited Activities and Circumvention	
40 CFR 63.5	Yes	Preconstruction Review and Notification Requirements	
40 CFR 63.6	Yes/No	Compliance with Standards and Maintenance Requirements	SSM Plans and exception from compliance during SSM events are not applicable when no add-on control device is utilized
40 CFR 63.7	Yes/No	Performance Testing Requirements	Not applicable when no capture and add-on control devices are utilized
40 CFR 63.8	No	Monitoring Requirements	Not applicable when no capture and add-on control devices are utilized
40 CFR 63.9	Yes	Notification Requirements	
40 CFR 63.10	Yes/No	Recordkeeping and Reporting Requirements	Applicable only to requirements when no add-on control device options used
40 CFR 63.11	No	Control Device and Work Practice Requirements	
40 CFR 63.12	Yes	State Authority and Delegations	
40 CFR 63.13	Yes	Addresses of State Air Pollution Control Agencies and EPA Regional Offices	
40 CFR 63.14	Yes	Incorporations by Reference	
40 CFR 63.15	Yes	Availability of Information and Confidentiality	

b. 40 CFR 63 Subpart A and Subpart DDDDD - NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters

Pursuant to 40 CFR 63 Subpart A and Subpart DDDDD, the Permittee shall comply with the following applicable General Provisions as indicated:

<i>General Provision Citation</i>	<i>General Provision Applicable?</i>	<i>Subject of Citation</i>	<i>Explanation (if required)</i>
40 CFR 63.1	Yes	General Applicability of the General Provisions	
40 CFR 63.2	Yes	Definitions	Additional terms are defined in 40 CFR 63.7575
40 CFR 63.3	Yes	Units and Abbreviations	
40 CFR 63.4	Yes	Prohibited Activities and Circumvention	
40 CFR 63.5	Yes	Preconstruction Review and Notification Requirements	
40 CFR 63.6	Yes/No	Compliance with Standards and Maintenance Requirements	See 40 CFR 63.7500(a)(3) for the general duty requirement. Startup, shutdown, and malfunction exemptions to opacity standards see 40 CFR 63.7500(a).
40 CFR 63.7	Yes/No	Performance Testing Requirements	Subpart DDDDD specifies conditions for conducting performance tests at 40 CFR 63.7520(a) to (c).
40 CFR 63.8	Yes/No	Monitoring Requirements	See 40 CFR 63.7500(a)(3) concerning general duty to minimize emissions and CMS operation
40 CFR 63.9	Yes	Notification Requirements	
40 CFR 63.10	Yes/No	Recordkeeping and Reporting Requirements	See 40 CFR 63.7555(d)(7) for recordkeeping of occurrence and duration and 40 CFR 63.7555(d)(8) for actions taken during malfunctions and 40 CFR 63.7550(c)(11) for malfunction reporting requirements..
40 CFR 63.11	No	Control Device and Work Practice Requirements	
40 CFR 63.12	Yes	State Authority and Delegations	
40 CFR 63.13	Yes	Addresses of State Air Pollution Control Agencies and EPA Regional Offices	
40 CFR 63.14	Yes	Incorporations by Reference	
40 CFR 63.15	Yes	Availability of Information and Confidentiality	
40 CFR 63.16	Yes	Performance Track Provisions	

5. Compliance Assurance Monitoring (CAM) Requirements

a. CAM Provisions

i. Proper Maintenance

Pursuant to 40 CFR 64.7(b), at all times, the source shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

ii. Continued Operation

Pursuant to 40 CFR 64.7(c), except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the source shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit (PSEU) is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of 40 CFR Part 64, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The source shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

iii. Response to Excursions or Exceedances

A. Pursuant to 40 CFR 64.7(d)(1), upon detecting an excursion or exceedance, the source shall restore operation of the PSEU (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

B. Pursuant to 40 CFR 64.7(d)(2), determination of whether the source has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device.

b. Monitoring - Monitoring

Pursuant to 40 CFR 64.7(a), the source shall comply with the monitoring requirements of the CAM Plans as described in 5 below, pursuant to 40 CFR Part 64 as submitted in the source's CAM plan application.

c. **Monitoring - Recordkeeping**

Pursuant to 40 CFR 64.9(b)(1), the source shall maintain records of the monitoring data, monitor performance data, corrective actions taken, monitoring equipment maintenance, and other supporting information related to the monitoring requirements established for CAM.

d. **Monitoring - Reporting**

Pursuant to Sections 39.5(7)(b) and (f) of the Act, the source shall submit the following reporting requirements:

i. **Semiannual Reporting**

As part of the required Semiannual Monitoring Reports, the source shall submit a CAM report including the following at a minimum:

- A. Summary information on the number, duration, and cause of excursions or exceedances, and the corrective actions taken pursuant to 40 CFR 64.6(c)(3) and 64.9(a)(2)(i).
- B. Summary information on the number, duration, and cause for monitoring equipment downtime incidents, other than downtime associated with calibration checks pursuant to 40 CFR 64.6(c)(3) and 64.9(a)(2)(ii).

e. **CAM Plans**

The following tables contain the CAM Plans in this CAAPP permit:

Table	Emission Unit Section	PSEU Designation	Pollutant
7.5.1	4.1	Coating Lines	VOM
7.5.2	4.2	Drum Reclamation Furnace (DRF)	VOM, PM

Table 7.5.1 - CAM Plan

Emission Unit Section:		4.1
PSEU Designation:		Coating Lines
Pollutant:		VOM
Indicators:	#1) Regenerative Thermal Oxidizer Temperature	
General Criteria		
The Monitoring Approach Used to Measure the Indicators:	Continuous temperature monitoring	
The Indicator Range Which Provides a Reasonable Assurance of Compliance:	Maintain a minimum of 1600°F when coating lines are in operation	
Quality Improvement Plan (QIP) Threshold Levels:	Threshold is the failure to maintain the minimum temperature during more than 5 percent of total operating time	
Performance Criteria		
The Specifications for Obtaining Representative Data:	A thermocouple	
Verification Procedures to Confirm the Operational Status of the Monitoring:	Operation and response of chart recorder	
Quality Assurance and Quality Control (QA/QC) Practices that Ensure the Validity of the Data:	Verification of connection and signal integrity. In addition, a quarterly calibration will be performed on the thermocouple.	
The Monitoring Frequency:	Continuous during operation	
The Data Collection Procedures That Will Be Used:	Chart recorder	
The Data Averaging Period For Determining Whether an Excursion or Exceedance Has Occurred:	Hourly block average	

Table 7.5.2 - CAM Plan

Emission Unit Section:	4.2	
PSEU Designation:	Drum Reclamation Furnace (DRF)	
Pollutant:	VOM, PM	
Indicators:	#1) Afterburner Chamber Temperature	#2) Physical Conditions of DRF
General Criteria		
The Monitoring Approach Used to Measure the Indicators:	Continuous temperature monitoring	Semi-annual inspections of DRF
The Indicator Range Which Provides a Reasonable Assurance of Compliance:	Maintain a minimum of 1600°F when introducing drums to the DRF	Maintain operation and proper function of all controls
Quality Improvement Plan (QIP) Threshold Levels:	Threshold is the failure to maintain the minimum temperature during more than 5 percent of total operating time	Threshold is the failure to achieve proper operation more than 5 percent of total operating time
Performance Criteria		
The Specifications for Obtaining Representative Data:	A thermocouple	Semi-annual inspection reports
Verification Procedures to Confirm the Operational Status of the Monitoring:	Operation and response of chart recorder	Semi-annual review of records
Quality Assurance and Quality Control (QA/QC) Practices that Ensure the Validity of the Data:	Verification of connection and signal integrity. In addition, a quarterly calibration will be performed on the thermocouple.	Semi-annual review of records
The Monitoring Frequency:	Continuous during operation	Semi-annual
The Data Collection Procedures That Will Be Used:	Chart recorder	Inspector checklist.
The Data Averaging Period For Determining Whether an Excursion or Exceedance Has Occurred:	Hourly block average	N/A

6. Compliance Schedule Requirements

The Illinois EPA, during a follow-up application and permit file review as a result of alleged permit deficiencies identified in comments, found sufficient evidence based on a stack test performed on the RTO in May of 2008 that the Permittee is in violation of Construction Permit 06030011, the CO and VOM limit in Condition 4.1.2(d) and (e). In addition, there is sufficient evidence to suggest that the RTO may not be performing as designed for all regulated pollutants.

- a. The Permittee shall comply with the following schedule of compliance applicable to the RTO used for coating line emissions:
- b. Enforceable Compliance Schedule

Commitment	Timing
Submit a test protocol in accordance with Condition 7.?	
Submit a notification of actual test date	
Perform testing	
Submit test results	
Apply for all permit modifications as appropriate based on test results	

- c. The testing required in Condition 7.6(b) above shall be performed under the following conditions
 - i. Representative of maximum pollutant loading at the inlet of the RTO,
 - ii. RTO combustion chamber operating at a minimum of 1600°F, and
 - iii. All pollutants regulated in Condition 4.1.1 shall be tested.
- d. Submittal of Progress Reports

Quarterly Progress Reports shall be submitted beginning with the xxxxxxxx quarter of xxxxxxxx and ending upon the achievement of compliance. Each quarterly report shall be submitted no later than 30 days after the end of the corresponding calendar quarter. The Progress Report shall contain at least the following:

- i. The required date for achieving commitments, and actual dates when such commitments were achieved.
- ii. Any commitments accepted by the Permittee or otherwise established for the RTO as part of any Compliance Commitment Agreement or Order, with the associated timing for each commitment.
- iii. A discussion of progress in complying with commitments that are subject to future deadlines.
- iv. If any commitment was not met, an explanation of why the required timeframe or commitment was not met, and any

preventive or corrective measures adopted to achieve required commitment.

Section 8 - State Only Requirements

1. Permitted Emissions for Fees

The annual emissions from the source for purposes of "Duties to Pay Fees" of Condition 2.3(e), not considering insignificant activities as addressed by Section 6, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. The Permittee shall maintain records with supporting calculations of how the annual emissions for fee purposes were calculated. This Condition is set for the purpose of establishing fees and is not federally enforceable. See Section 39.5(18) of the Act.

<i>Pollutant</i>		<i>Tons/Year</i>
Volatile Organic Material	(VOM)	123.86
Sulfur Dioxide	(SO ₂)	0.07
Particulate Matter	(PM)	22.41
Nitrogen Oxides	(NO _x)	9.87
HAP, not included in VOM or PM	(HAP)	----
Total		156.17

Attachment 1 - List of Emission Units at This Source

<i>Section</i>	<i>Emission Units</i>	<i>Description</i>
4.1	Coating Line #1	Interior coating line with spray booth (SPB-1) and steam flash oven (FO-1)
4.1	Coating Line #2	Primer coating line with coating booth (SPB-2) and curing oven (CO-1)
4.1	Coating Line #3	Exterior coating line with coating booth (SPB-3) and curing oven (CO-2)
4.1	Coating Line #4	Interior coating line with spray booth (SPB-4) and steam flash oven (FO-1)
4.1	Coating Line #5	Exterior coating line with coating booth (SPB-5) and curing oven (CO-2)
4.1	Coating Line #6	Exterior coating line with coating booth (SPB-6) and curing oven (CO-3)
4.1	Coating Line #7	Ring dip coating line with dip coater (DC-1) and curing oven (CO-2)
4.2	Drum cleaning reclamation furnace	Natural gas-fired drum cleaning and reclamation furnace (DRF-1)
4.3	Shot Blaster	Shot blaster for removing scale (SB-1)
4.3	Shot Blaster	Shot blaster for removing scale (SB-2)
4.3	Shot Blaster	Shot blaster for removing scale (SB-3)
4.3	Shot Blaster	Shot blaster for removing scale (SB-4)
4.3	Shot Blaster	Shot blaster for removing scale (SB-5)
4.4	Natural-gas fired boiler	Natural gas-fired boiler (12mmBtu/hr) (B-1)
4.4	Waste Heat boiler on DRF-1	Heat recovery from the afterburner on the Drum Reclamation Furnace
4.5	Storage Tank	Underground Gasoline Tanks

Meyer Steel Drum, Inc.
I.D. No.: 031600APY
Permit No.: 95120079

Date Received: 9-8-2009
Date Issued: TBD

Attachment 2 - Acronyms and Abbreviations

acfm	Actual cubic feet per minute
ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment trading unit
BACT	Best Available Control Technology
BAT	Best Available Technology
BTU	British Thermal Units
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAIR	Clean Air Interstate Rule
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CISWI	Commercial Industrial Solid Waste Incinerator
CO	Carbon monoxide
CO ₂	Carbon dioxide
COMS	Continuous Opacity Monitoring System
CPMS	Continuous Parameter Monitoring System
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
EAF	Electric arc furnace
ERMS	Emissions Reduction Market System
°F	Degrees Fahrenheit
GHG	Green house gas
gr	Grains
HAP	Hazardous air pollutant
Hg	Mercury
HMIWI	Hospital medical infectious waste incinerator
HP	Horsepower
hr	Hour
H ₂ S	Hydrogen sulfide
I.D. No.	Identification number of source, assigned by IEPA
IAC	Illinois Administrative Code
ILCS	Illinois Compiled Statutes
IEPA	Illinois Environmental Protection Agency
KW	Kilowatts
LAER	Lowest Achievable Emission Rate
lb	Pound

Meyer Steel Drum, Inc.

I.D. No.: 031600APY

Permit No.: 95120079

Date Received: 9-8-2009

Date Issued: TBD

m	Meter
MACT	Maximum Achievable Control Technology
mm	Million
mon	Month
MSDS	Material Safety Data Sheet
MSSCAM	Major Stationary Sources Construction and Modification (Non-attainment New Source Review)
MW	Megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen oxides
NSPS	New Source Performance Standards
NSR	New Source Review
PM	Particulate matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
PM _{2.5}	Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods
ppm	Parts per million
ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration
PSEU	Pollutant-Specific Emission Unit
psia	Pounds per square inch absolute
PTE	Potential to emit
RACT	Reasonable Available Control Technology
RMP	Risk Management Plan
scf	Standard cubic feet
SCR	Selective catalytic reduction
SIP	State Implementation Plan
SO ₂	Sulfur dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile organic material

Attachment 3 - Contact and Reporting Addresses

<p>IEPA Compliance Section</p>	<p>Illinois EPA, Bureau of Air Compliance & Enforcement Section (MC 40) 1021 North Grand Avenue East P.O. Box 19276 Springfield, IL 62794-9276</p> <p>Phone No.: 217/782-2113</p>
<p>IEPA Stack Test Specialist</p>	<p>Illinois EPA, Bureau of Air Compliance Section Source Monitoring - Third Floor 9511 Harrison Street Des Plaines, IL 60016</p> <p>Phone No.: 847/294-4000</p>
<p>IEPA Air Quality Planning Section</p>	<p>Illinois EPA, Bureau of Air Air Quality Planning Section (MC 39) 1021 North Grand Avenue East P.O. Box 19276 Springfield, IL 62794-9276</p> <p>Phone No.: 217/782-2113</p>
<p>IEPA Air Regional Field Operations Regional Office #1</p>	<p>Illinois EPA, Bureau of Air Regional Office #1 9511 Harrison Street Des Plaines, IL 60016</p> <p>Phone No.: 847/294-4000</p>
<p>IEPA Permit Section</p>	<p>Illinois EPA, Bureau of Air Permit Section (MC 11) 1021 North Grand Avenue East P.O. Box 19506 Springfield, IL 62794-9506</p> <p>Phone No.: 217/785-1705</p>
<p>USEPA Region 5 - Air Branch</p>	<p>USEPA (AR - 17J) Air and Radiation Division 77 West Jackson Boulevard Chicago, IL 60604</p> <p>Phone No.: 312/353-2000</p>

Attachment 4 - Example Certification by a Responsible Official

SIGNATURE BLOCK	
NOTE: THIS CERTIFICATION MUST BE SIGNED BY A RESPONSIBLE OFFICIAL. APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE DEEMED AS INCOMPLETE.	
I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION CONTAINED IN THIS APPLICATION ARE TRUE, ACCURATE AND COMPLETE. ANY PERSON WHO KNOWINGLY MAKES A FALSE, FICTITIOUS, OR FRAUDULENT MATERIAL STATEMENT, ORALLY OR IN WRITING, TO THE ILLINOIS EPA COMMITS A CLASS 4 FELONY. A SECOND OR SUBSEQUENT OFFENSE AFTER CONVICTION IS A CLASS 3 FELONY. (415 ILCS 5/44(H))	
AUTHORIZED SIGNATURE:	
BY: _____	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____/_____/_____
TYPED OR PRINTED NAME OF SIGNATORY	DATE

Meyer Steel Drum, Inc.
I.D. No.: 031600APY
Permit No.: 95120079

Date Received: 9-8-2009
Date Issued: TBD